

# TSD File Inventory Index

Date: January 31, 2001

Initial: CMH/MSH

Facility Name: <u>San Chemical Corporation (GPB Division - Taz folder etc)</u>			
Facility Identification Number: <u>1LD075603886</u>			
<b>A.1 General Correspondence</b>		<b>B.2 Permit Docket (B.1.2)</b>	
<b>A.2 Part A / Interim Status</b>		.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	<b>C.1 Compliance - (Inspection Reports)</b>	Y
.3 Part A Application and Amendments	Y	<b>C.2 Compliance/Enforcement</b>	Y
.4 Financial Insurance (Sudden, Non Sudden)	Y	.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		<b>C.3 FOIA Exemptions - Non-Releasable Documents</b> <u>C-3</u>	1
<b>A.3 Groundwater Monitoring</b>		<b>D.1 Corrective Action/Facility Assessment</b>	Y
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
<b>A.4 Closure/Post Closure</b>	Y	.3 State Prelim. Investigation Memos	
.1 Correspondence	Y	.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc	Y	<b>D. 2 Corrective Action/Facility Investigation</b>	
<b>A.5 Ambient Air Monitoring</b>		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
<b>B.1 Administrative Record</b>		.4 RFI Draft /Final Report	

Total - 2

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not match indicated field/schedule. C. 3  
 Supplemental information is provided on separate page



PART A FILE



ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

ILD075603886

REACKNOWLEDGEMENT

SUN CHEMICAL CORP-GPI DIVISION  
PO BOX 352  
KANKAKEE

IL 60901

INSTALLATION ADDRESS

3200 FESTIVAL DRIVE  
KANKAKEE

IL 60901





**ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)**

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EPA I.D. NUMBER

ILD075603886

REACKNOWLEDGEMENT

SUN CHEMICAL CORP GPI DIVISION  
PO BOX 352  
RANKAKEE

IL 60901

INSTALLATION ADDRESS

3200 FESTIVAL DRIVE  
RANKAKEE

IL 60901

08/14/81

U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transferer's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

ILD075603886

NAME OF INSTALLATION

INSTALLATION MAILING ADDRESS

SUN CHEMICAL CORP - GPI DIVISION  
PO BOX 352  
KANKAKEE, IL 60901

000506 AUG 12 1980

LOCATION OF INSTALLATION

~~FESTIVAL RD~~  
KANKAKEE, IL 60901

## FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED  
(yr., mo., & day)

F I L D 0 7 5 6 0 3 8 8 6

A

8 0 0 8 1 2

## I. NAME OF INSTALLATION

SUN CHEMICAL CORP - GPI DIVISION

## II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3

CITY OR TOWN

ST.

ZIP CODE

4

## III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 3 2 0 0 FESTIVAL DRIVE

CITY OR TOWN

ST.

ZIP CODE

6

## IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, &amp; job title)

PHONE NO. (area code &amp; no.)

2 A I T O R O P E T E R S A F / H E A L T H M G R

2 0 1 9 3 3 4 5 0 0

## V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 S U N C H E M I C A L C O R P O R A T I O N

B. TYPE OF OWNERSHIP  
(enter the appropriate letter into box)F - FEDERAL  
M - NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☒ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

I L D 0 7 5 6 0 3 8 8 6

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.



# IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F002	2 F003	3 F005	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 K086	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 P030	32 U220	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE  
(D001)

☒ 2. CORROSIVE  
(D002)

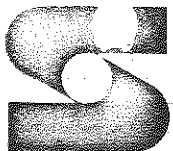
☐ 3. REACTIVE  
(D003)

☒ 4. TOXIC  
(D000)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>J. McBurews</i>	NAME & OFFICIAL TITLE (type or print) J. McBurews BRANCH MANAGER	DATE SIGNED 8/7/80
---------------------------------	--	-----------------------

*not file*

August 11, 1983

RECEIVED

AUG 15

WASTE MANAGEMENT BRANCH  
EPA, REGION VPENDING ACTION TAKEN  
DATE 8/18/83  
BY EPA STAFFMs. Rebecca Strom  
RCRA Permitting Activity  
U.S.E.P.A. - Region V  
Post Office Box 3587A  
Chicago, Illinois 60690-3587

Dear Ms. Strom:

In response to our recent conversation regarding withdrawal of the Part A Hazardous Waste Permit application, I have enclosed a letter of authorization pertaining to my signature on the withdrawal request.

In past conversations with your department, it was stated that Sun Chemical originally filed for interim status, not fully understanding its implications. Therefore, we are requesting a withdrawal from TSD to generator for the following facilities:

EPA I.D's	OHD 004234811 G, T, TSD, PA
	MID 044254563 G, T, TSD, PA
	ILD 053191029 G, T, TSD, PA
	ILD 051093367 G, T, TSD, PA

I have received the application withdrawal letter for the above locations, however, please advise on the following facilities and their status regarding their withdrawal from the system:

IND 067867945 G, T, TSD, PA	WID 053682506 G, T, TSD, PA
ILD 075603886 G, T, TSD, PA ✓	MOD 006288658
MOD 007136930	MOD 00829630
MID 000722967 G, T, TSD, PA	ILD 000666040 G, T, TSD, PA
WID 041193087 G, T, TSD, PA	ILD 000666057 NRS 7

Your help in this matter is greatly appreciated. Should you require any additional information, please do not hesitate in contacting my office.

Very truly yours,

SUN CHEMICAL CORPORATION

G. M. Andrzejewski  
GPI Division Manager  
Safety, Health & EnvironmentRECEIVED  
8/16/83GMA:sw  
Enc. 1



Mike.Davison@epa.state.il.us on 11/02/2000 11:54:18 AM

To: Diane Sharrow  
Subject: Sun Chemical

*Sun Chemical*

Diane,

The Illinois EPA has received copies of USEPA's letters to Sun Chemical Co. at 3200 Festival Drive in Kankakee, IL. Our records show that the USEPA ID # should be ILD 075 603 886 instead of what is in the letters. The number in the letter appears to be for Combe Laboratories in Champaign County. Future cc: for the Sun Chemical facility should go to Cliff Gould at our Des Plaines regional office instead of Ken Keigley. Let me know if this is incorrect.

Thanks, Mike

*ILD 075 603 886*

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>1. Article Addressed to:</p> <p>John J. Kujawa Sun Chemical Company 3200 Festival Drive Kankakee, IL 60901</p>		<p>A. Received by (Please Print Clearly) _____</p> <p>B. Date of Delivery <i>10-25-00</i></p>	
<p>2. Article Number (Copy from service label) <i>7099 3400 0000 9593 0022</i></p> <p>PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1739</p>		<p>C. Signature <i>John J. Kujawa</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	



217/782-6761

Refer to: # 0910550011 -- Kankakee County  
Sun Chemical Corp.  
ILD 075603888  
RCRA - Permits

May 6, 1988

Sun Chemical Corp.  
3200 Festival Drive  
Kankakee, Illinois 60901

Attn: Environmental Coordinator or  
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart D. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For your convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.





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In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to \$25,000 per day of noncompliance.



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The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
P.O. Box 19276  
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

Lawrence H. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LHE:JKH:drs/12385/12445/1-3

Enclosures

cc: Division File  
Compliance  
Haywood Region  
USPEA Region V







Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

February 24, 1995

Michael T. Shoven, Plant Manager  
Sun Chemical Corp.  
P.O. Box 352  
Kankakee, IL 60901

Re: 0910550011 -- Kankakee County  
Sun Chemical Corp.  
ILD075603886  
RCRA-Closure  
Closure Log No. C-435-M-1  
Received: 4-14-94

Dear Mr. Shoven:

This is in response to the certification of closure submitted by Sun Chemical for the North and South (S01) Waste Storage Areas at the above-referenced facility. This certification, signed by a representative of the owner/operator, Michael T. Shoven and an independent registered professional engineer, Robert J. Millman, indicated that the subject hazardous waste management units have been closed in accordance with the plan approved by the Agency on October 26, 1989.

The subject hazardous waste management units were inspected by a representative of this Agency on May 15, 1994. The inspection revealed that the unit was closed in accordance with the approved closure plan. In addition, a review of the closure certification and accompanying closure documentation report also indicates that the unit was closed in accordance with the approved closure plan. Therefore, the Agency has determined that closure of the North and South (S01) Waste Storage Areas at the above referenced facility have apparently met the requirements of 35 IAC 725.

As a result of completing closure of the subject hazardous waste management units:

1. The Agency has withdrawn your Part A application.
2. This facility must continue to meet the requirements of 35 IAC 722 Standards Applicable to Generators of Hazardous Waste and 35 IAC 728 Land Disposal Restrictions.

Sun Chemical Corp.  
LPC#0910550011  
December, 1994  
Page 2

Should you have any questions regarding this matter, please contact Ron Rybolt at 217/524-3300.

Sincerely,



Harry A. Chappel, P.E.  
Hazardous Waste Branch Manager  
Permit Section, Bureau of Land

HAC:RGR *JH*

cc: Robert J. Millman, P.E.

bcc: Bureau File  
Maywood Region  
Jerry Kuhn  
Ron Rybolt  
Todd Marvel

Mary Murphy



Illinois Environmental Protection Agency • P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Log No. C-435

Received: November 23, 1988

Refer to: 0910550011 -- Kankakee County  
Kankakee/Sun Chemical  
ILD075603886  
RCRA-Closure

January 5, 1989

Sun Chemical Corporation  
Attn: Gary M. Andrzejewski  
135 West Lake Street  
Northlake, Illinois 60164

Dear Mr. Andrzejewski:

The closure plan submitted by yourself and prepared by Process Engineering Group, Inc. has been reviewed by this Agency. Your final closure plan to close the two (2) hazardous waste container (S01) storage areas is hereby approved subject to the following conditions and modifications.

1. Closure activities must be completed by August 1, 1989. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within 60 days after closure, or by October 1, 1989.

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E. The closure plan must include a statement acknowledging this requirement.



Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

As part of the closure certification, to document the closure activities at your facility, please submit a Closure Documentation Report which includes:

- a. The volume of waste and waste residue removed. The term waste includes wastes resulting from decontamination activities.
- b. A description of the method of waste handling and transport.
- c. The waste manifest numbers.
- d. Copies of the waste manifests.
- e. A description of the sampling and analytical methods used.
- f. A chronological summary of closure activities and the cost involved.
- g. Color photo documentation of closure. Document conditions before, during and after closure.
- h. Tests performed, methods and results.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency  
Division of Land Pollution Control -- #24  
Permit Section  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

2. Along with your certification of closure, please submit a letter requesting withdrawal of your facility's Part A application.
3. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency



reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.


4. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.
5. The concrete surfaces shall be visually inspected, photographed and any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete surfaces must be steam cleaned and triple rinsed. All wash and rinse water shall be collected. If the wash or rinse water samples exhibit a characteristic of hazardous waste then that material must be managed as a hazardous waste. In any event the material must be managed as a special waste.
6. All samples shall be analyzed individually (i.e., no compositing). Sampling and analytical procedures shall be conducted in accordance with the latest edition of SW-846 and Attachment 7 to this Agency's closure plan instruction package. Sample size per interval shall be minimized to prevent dilution of any contamination. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed. To demonstrate a parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the latest edition of SW-846.
7. The cleanup objectives proposed in the closure plan are not approved. The Agency will establish clean-up objectives to be used to determine if "clean" closure (closure by removal) has been achieved upon receipt and review of the sampling and analytical results required in the approved closure plan. These sampling and analytical results along with a proposal for site specific clean-up objectives (if you wish to propose them) must be submitted to this Agency by May 1, 1989.



Page 4

Should you have any questions regarding this matter, please contact Eugene W. Dingledine at 217/782-5504.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:EWD:jd/3979j/42

Attachment

cc: Northern Region  
Division File - RCRA Closure  
Andy Vollmer  
Process Engineering Group, Inc., P.E.  
USEPA Region V -- George Hamper  
USEPA Region V -- Mary Murphy  
Compliance Section





ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

Closure Log C-435

The hazardous waste management S01 Units at the facility described in this document have been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
USEPA ID Number

\_\_\_\_\_  
Facility Name

\_\_\_\_\_  
Signature of Owner/Operator

\_\_\_\_\_  
Name and Title

\_\_\_\_\_  
Signature of Registered P.E.

\_\_\_\_\_  
Name of Registered P.E. and Illinois  
Registration Number

\_\_\_\_\_  
Date

EWD:jd/3979j/46





October 19, 2000

Ms Diane Sharrow  
United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard, DE-9J  
Chicago, Illinois 60604

Ms. Sharrow:

This letter is sent in response to the US EPA letter, dated August 16, 2000 and received August 21, 2000. The US EPA letter documented the fact that our request for a 90 day extension, to submit a revised emergency contingency plan, had been granted.

Please find the updated Emergency Contingency Plan, for your review, included in this mailing.

If there are any questions, feel free to notify me at (815) 939-0136. Thanks again for your understanding and cooperation in granting the extension.

Sincerely



John J. Kujawa  
Plant Engineer  
Sun Chemical  
3200 Festival Drive  
Kankakee, IL 60901

cc: R. Klecan  
J. McBurrows  
C. Raycroft

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John J. Kujawa  
 Sun Chemical Company  
 3200 Festival Drive  
 Kankakee, IL 60901

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 Sun Chemical Company  
 3200 Festival Drive  
 Kankakee, IL 60901

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Ms. Diane Sharrow  
U.S. EPA (DE-9J)  
77 W. Jackson Blvd.  
Chicago, IL 60604

ILD075603886

US ENVIRON  
PROTECTION  
REGIC

00 SEP 12

REGIONAL H  
CEN

10



September 18, 2000

Ms. Diane Sharrow  
United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard, DE-9J  
Chicago, Illinois 60604

Ms. Sharrow:

This letter has been written in response to your letter dated August 16, 2000 and received August 21, 2000.

In the August 16<sup>th</sup> letter, you requested that we verify that we have a training program in place, which addressed the following items:

1. the procedures to familiarize personnel with emergency procedures, emergency equipment and emergency systems
2. the procedures for using, inspecting, repairing and replacing
  - emergency and monitoring equipment, and
  - communications and alarm systems.
3. the procedures to be followed in responding to
  - fires,
  - explosions, and
  - groundwater contamination
4. the procedure to shut down processes during emergencies, as listed above.

These items are covered in the expanded training syllabus, included as "Appendix A" in this letter. The material in the expanded training syllabus has been presented in short training sessions or at shift safety meetings in the past. This method of training with small amounts of information, at any one time, has been found to be more than satisfactory because the employees were less likely to lose focus with long, drawn out presentations.

With regard to other questions asked in your letter,

- The names of the two employees requiring training, at the time of your last visit, were Jason Summers and myself (John Kujawa). We were both trained by the Production Manager, Ron Klecan, on July 27, 2000.
- The job descriptions of the two employees are as follows:  
Jason Summers - Blender (job description included)  
John Kujawa - Plant Engineer
- The expanded syllabus is included as "Appendix A"





# SunChemical

- The name of the trainer is Ron Klecan, Production Manager
- Copies of the tests are included
- The documentation that the training was completed is included with our ISO records. These records were shown to Ms. Sharrow and her associate from the USEPA during their visit on May 22, 2000.

If there are any other questions, please feel free to call me at (815) 939-0136.

Sincerely,



John J. Kujawa  
Plant Engineer  
Sun Chemical  
3200 Festival Drive  
Kankakee, IL 60901

Blender Job Description	
Author: Ron Klecan	Effective Date: September 30, 1997

## 1.0 Purpose

1.1 This document states the job description for the position of Blender at the Kankakee Plant.

## 2.0 Scope

2.1 Job Title: Blender  
Department: Blending  
Location: Kankakee  
Reports to: Shift Supervisor

### Basic Functions:

Under the direction of local management, in accordance with state and federal regulations, performs all blending related duties in a safe and efficient manner.

## 3.0 Responsibilities

- 3.1 Operate blending equipment such as mix tanks, pumps, scale equipment, and other related blending equipment.
- 3.2 Operate material handling equipment such as forklifts, pallet movers, etc.
- 3.3 Fill various containers with ink related products for storage and shipment.
- 3.4 Work with calibration charts, measuring instruments, and do mathematical calculations and extensions.
- 3.5 Perform all blending related duties.

### Requirements/ Qualifications

High School graduate or equivalent. past Industrial Experience (preferably in the hazardous materials field). Basic computer literacy, and basic knowledge of mathematical computations. Must pass physical exam.

*John T. Torgano*  
7/27/00

# HAZARDOUS WASTE QUIZ

1. HOW MANY GALLONS OF HAZARDOUS WASTE CAN BE ACCUMULATED IN A SATILLITE AREA?  
a. 100 GALLONS  
☒ b. 55 GALLONS  
c. 75 GALLONS
2. WHEN SHOULD A DRUM LABELED  
a. WHEN IT IS FULL  
b. WHEN IT IS HALF FULL  
☒ c. WHEN IT IS STARTED
3. WHAT TTHREE TYPES OF HAZARDOUS WASTE DO WE GENERATE?  
a. SOLID  
b. PUMPABLE (LIQUID )  
c. HEELS  
☒ d. A, b AND c
4. EACH DRUM OF HAZARDOUS WASTE MUST HAVE A HAZARDOUS WASTE LABEL AND A FLAMMABLE LIQUI OR SOID LABEL.  
☒ a. TRUE  
b. FALSE
5. A PERMENENT MARKER MUST BE USED TO RECORD INFORMATION ON THE WASTE LABEL.  
☒ a. TRUE  
b. FALSE
6. A WASTE DRUM TICKET IS FILL OUT WHEN THE DRUM IS FULL AND IT IS MOVED TO THE CONTAINMENT AREA.  
☒ a. TRUE  
~~b. FALSE~~
7. IN THE EVENT OF AN EMERGENCY, YOU SHOULD EXIT THE BUILDING BY WAY OF THE NEAREST EXIT AND MEET AT THE FRONT MAIN GATE.  
☒ a. TRUE  
b. FALSE



S. Training  
7.28.00

## HAZARDOUS WASTE QUIZ

1. HOW MANY GALLONS OF HAZARDOUS WASTE CAN BE ACCUMULATED IN A SATILLITE AREA?  
a. 100 GALLONS  
☒ b. 55 GALLONS  
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☒ a. TRUE  
☒ b. FALSE
7. IN THE EVENT OF AN EMERGENCY, YOU SHOULD EXIT THE BUILDING BY WAY OF THE NEAREST EXIT AND MEET AT THE FRONT MAIN GATE.  
☒ a. TRUE  
b. FALSE

## EMERGENCY EQUIPMENT AND PROCEDURES TRAINING PROGRAM

<u>Purpose</u>	The purpose of the <u>Emergency Equipment and Procedures Program</u> is to provide employees with initial and refresher training in the prevention, detection and handling of emergencies which may arise at the facility. This training program has also been developed to fulfill the requirements of IAC 35, Section 725.116 (a), (b), (c), (d) and (e).
<u>Effectuated Employees</u>	All employees at the facility are to be trained in response to emergencies. Maintenance and management personnel are also to be trained in the operation and maintenance of emergency and communications equipment.
<u>Frequency</u>	Initial training shall be conducted within 6 months of the employee's first day of work. Refresher training shall be conducted once per calendar year.
<u>Trainer</u>	Training shall be conducted by a member of management (or it's designate) familiar with emergency procedures at the facility (As of the date of this revision, the primary trainer is the Production Manager, Ron Klecan.)
<u>Syllabus</u>	A training syllabus is included in Appendix A. It is subject to review before each training session.
<u>Testing</u>	A quiz will be given at the end of each of the training sessions. The quiz will be reviewed, with the participants, after completion.
<u>Record Keeping</u>	<p>Records of training will be kept in the office of the plant trainer. They will include the following:</p> <ul style="list-style-type: none"><li>• Name of the employee</li><li>• Date of training</li><li>• Sign in sheet of employees trained</li><li>• Completed quizzes</li></ul> <p>Training summary sheets are also kept in the files of the ISO 9002 Coordinator.</p>

## Appendix A

### Emergency Equipment and Procedures Training Program Training Syllabus

- I Introduction
- II Subjects to be addressed
  - a) Procedures for using, inspecting, repairing and replacing facility emergency or monitoring equipment;
  - b) Key parameters for automatic waste feed cut-off systems;  
(NOTE: This subject is not pertinent to our operation and will not be covered)
  - c) Communications or alarm systems;
  - d) Response to fires or explosions;
  - e) Response to groundwater contamination incidents; and
  - f) Shutdown of operations
- III Procedures for “using”, “inspecting”, “repairing” and “replacing” facility emergency or monitoring equipment;

#### Fire Control

##### a) Fire extinguishers

- “Using”

The procedures and techniques for “using” the various types of fire extinguishers are taught and demonstrated annually by the company who inspects and services our extinguishers monthly, currently Liberty Fire Equipment Company, Inc.

An extinguisher may be used by any employee trained in its operation.

Fire extinguishers are for initial response to small fires only.

- “Inspecting”, “repairing”, “replacing”

Extinguishers are inspected monthly by an outside contractor. If an extinguisher is found to require a “charge”, the outside contractor handles it immediately. If the extinguisher requires repair or replacement, it is also handled by the outside contractor.

##### b) Fire hoses

- “Using”

Fire hoses are located around the plant. They would be used for minor fires but only in areas without the possibility of exposure to electrically driven equipment, electrical outlets, motor control centers, etc.

Hoses are normally used by the Fire Department.

- “Inspecting”, “repairing”, “replacing”

Hoses are inspected monthly by area personnel and the maintenance department. If a hose is found to be in need of repair or replacement, the Maintenance Supervisor will issue a purchase order for the

- III Procedures for “using”, “inspecting”, “repairing” and “replacing” facility emergency or monitoring equipment; (continued)
- b) Fire hoses (continued)
- “Inspecting”, “repairing”, “replacing” (continued)  
required materials or in certain situations, issue an order for the outside fire extinguisher inspection company to make the repairs.
- c) Sprinkler System
- “Using”  
The sprinkler system comes on automatically if a fire occurs. Its operation is monitored by ADT, through a flow switch. ADT summons the fire department if it senses water flow in a sprinkler supply line.
  - “Inspecting”, “repairing”, “replacing”  
The sprinkler system is inspected monthly, by plant personnel, as part of the plant safety inspection. The pumps, foam tank, gauges and valves are checked annually by Cannon Fire Protection Company and Royal Sun Alliance.  
If repairs or replacements are required, they are performed by Cannon Fire Protection Company.  
The monitoring of the sprinkler system controls is performed by the ADT Security Company. They inspect the system monthly and make any required repairs or replacements.

## Spill Control

### a) Absorbent material

- “Using”  
Materials like “Absorbit” are designed to soak up small quantities of solvent and inks which may have spilled on a floor. It may be used by any employee whose job involves receiving, processing or shipping solvents or inks; or the maintenance of equipment which contains or processes solvents or inks. The material is normally spread on the spill using non-sparking, aluminum shovels and beryllium rakes. The shovels and rakes are kept locked up in the security cage, in the warehouse. However, each supervisor has a key to the security cage. After the absorbent material is soaked up, it is shoveled into drums and handled as a hazardous waste. (See Hazardous Waste Handling Procedures)

Employees are instructed to notify the Maintenance Supervisor if they have used any absorbent material. The material is stored at two locations in the plant, the warehouse and the garage. If the number of bags, at either location, drops to less than ½ of a skid, an additional replacement skid is ordered by the Maintenance Supervisor.

- “Inspecting”, “repairing”, “replacing”  
These terms are irrelevant, with regard to absorbents.



## III Procedures for “using”, “inspecting”, “repairing” and “replacing” facility emergency or monitoring equipment; (continued)

### b) Aluminum shovels and beryllium rakes

- “Using”  
The shovels are used during clean-ups of solvent or printing inks. They are used to spread and pick-up absorbent materials. These items are normally used by operators or maintenance personnel, but may be used by any employee under the supervision of the supervisor. (See section III a), above for their location)
- “Inspecting”, “repairing”, “replacing”  
The condition of the shovels and rakes are noted whenever used. If they require repair or replacement, it is the obligation of the employee using the tool to notify the Maintenance Supervisor, who will have the item repaired or replaced.

### c) PIG Spill Kit

- “Using”  
The spill kit contains items such as absorbent bags, plastic sheeting and other articles often used to prevent spills from spreading and reaching sewers. It is located in the eastern section of the garage, in an oversized, white drum. The kit is often used in conjunction with absorbent booms.
- “Inspecting”, “repairing”, “replacing”  
The PIG Spill Kit is in a watertight container. Past inspections have found that the materials contained in the kit remain in sound condition, as long as the drum is kept closed. Therefore, at the present time, the kit is only inspected when the eastern section of the garage is cleaned. Any material utilized at the time of a spill would be replaced by the Maintenance Supervisor at the time of the spill.

### d) Absorbent “Booms”

- “Using”  
Absorbent “Booms” are tubular cloth socks, which contain absorbent materials. They are used to direct large spills or absorb small spills. Booms are also used to shield sewers from leaks or surround small leaking vessels such as 55-gallon drums. They may be utilized by any employee under the direction of a supervisor. Booms are approximately 6” in diameter and vary in length. Booms are located in the western section of the garage.

### III Procedures for “using”, “inspecting”, “repairing” and “replacing” facility emergency or monitoring equipment; (continued)

#### d) Absorbent “Booms” (continued)

- “Inspecting”, “repairing”, “replacing”

Like the PIG Spill Kits, the booms are stored securely. Past inspections have shown them to remain in good condition when stored under plastic sheeting. Therefore, they are only inspected when the western section of the garage is cleaned. The booms will be replaced when utilized during a spill or if found to be deteriorated following an inspection, when cleaning out the western section of the garage.

#### Monitoring Equipment/Systems

##### a) ADT – Monitoring System

- “Using”

The monitoring system detects fires, security breaches, etc. There are no requirements for training in this section.

- “Inspecting”, “repairing”, “replacing”

ADT makes monthly checks on their system and handles any repairs or replacements necessary.

### IV Communications or alarm systems

#### Communication Systems

##### a) Telephone System

- “Using”

Communications across the plant are conducted with a common phone system. The telephone can be used for paging or for calling the emergency number 911, during an emergency response.

To page – Pick up the receiver, press “PAGE”. After the word “BOTH” appears on the screen, press the button under the word “BOTH” two times. The paging system should be energized. Make the announcement and hang up the telephone. Notify your supervisor and practice the technique.

To dial 911 – NOTIFY YOUR SUPERVISOR. IF YOUR SUPERVISOR INSTRUCTS YOU TO CALL 911, DO THE FOLLOWING: Pick up the receiver, dial 9 for an outside line, then dial 911 to obtain emergency fire or police assistance. Be prepared to give emergency information regarding the nature of the emergency.

- “Inspecting”, “repairing”, “replacing”

The telephone is used continuously while the plant is in operation. Therefore, there is no program for “inspection”, “repairing” or “replacing”. If the phone service fails at any time, the problem is immediately called into the local phone service provider. This is

## IV Communications or alarm systems (continued)

### Communication Systems (continued)

#### a) Telephone System (continued)

- “Inspecting”, “repairing”, “replacing” (continued)  
normally done by the Office Manager, another member of management or one of the office clerks.

### Alarm Systems

There are two alarm systems utilized in the plant. The first is an internal system which sounds the siren for evacuation. The second is an external alarm system which monitors the operation of the fire pump and sprinkler system, then notifies the Kankakee Fire Department and the ADT Security company. The second system also monitors when the Halon system is activated in the motor control centers, MCC-1 and MCC-2.

#### a) Internal Alarm

- “Using”  
At the first sign of a fire in the plant, the employee is to notify his/her supervisor immediately. If deemed necessary, he/she will activate one of four (4) internal alarm pull-boxes, to set off the evacuation siren. They are located as follows:
  1. at the door of the shipping office,
  2. in the production area, to the right of the lab window,
  3. inside the old pump house,
  4. outside the building at the truck unloading area.(The employee will also activate an ADT pull-box to notify ADT and summon the local fire department.)
- “Inspecting”, “repairing”, “replacing”  
The internal alarm is tested once per year as part of the annual plant evacuation. If any problem occurs, the pull boxes, siren or wiring are repaired or replaced as necessary.

#### b) External (ADT) Alarm

- “Using”  
At the first sign of a fire in the plant, the employee is to notify his supervisor immediately. If deemed necessary, he/she will activate one of five (5) ADT alarm pull-boxes, to notify ADT and summon the Kankakee Fire Department  
They are located as follows:
  1. in the drivers vestibule, adjacent to the shipping office,
  2. in the southwest corner of the warehouse, near the pedestrian door,
  3. inside the attritor room, on the wall of the motor control center,
  4. at the exit door from the office
  5. in the vestibule of the employees entrance.



The external alarm may also be activated by using the Halon System pull-box outside of MCC-1 or by using one of the three (3) Halon System pull-boxes outside of MCC-2. The Halon pull-box will also activate the Halon fire suppression system.

If the Halon system is activated in error, there is an emergency button within 5 feet of the Halon system control panel. This emergency button will stop the discharge of Halon into the room.

(The employee will also activate an **internal alarm** pull-box to sound the evacuation siren.)

- “Inspecting”, “repairing”, “replacing”  
The external, or ADT alarm system, is inspected monthly by a serviceman from ADT. The serviceman also makes any necessary repairs or replacements on the system.

## V Response to fires and explosions

### Fires

The Sun Chemical facility in Kankakee, Illinois does not have an Emergency Brigade. Therefore, the employees are restricted to initial response only. They may use fire extinguishers for initial response, provided that they have been trained in their use.

In the case of a fire, the following is expected from the employee

- Small Controllable Fire

If more than one employee is present when the fire is still in its initial stage, a fire extinguisher may be used, while a second employee notifies a supervisor

If one employee is present, and an extinguisher is readily available, he/she may make an initial response. If the fire is not immediately extinguished, the employee shall notify his supervisor. If the fire shows any sign of spreading, or the supervisor fails to respond within two to three minutes, the employee shall pull the nearest ADT alarm, to summon the fire department, and activate the nearest internal alarm, to sound the evacuation siren.

The employee or supervisor shall also activate the paging system, and announce that an emergency situation exists, and that all employees shall evacuate the area.

Employees, under the direction of the supervisor shall shut down processes to the extent possible.

Before evacuating, the employee or supervisor shall pass through the employee entrance, break the glass and push the electrical cut-off, next to the time clock

IN NO CASE SHALL EMPLOYEES ENDANGER THEMSELVES IN AN EFFORT TO FIGHT A FIRE.



- Medium to Advanced Fires

Immediately notify or page your supervisor. If the supervisor does not respond within two to three minutes, or cannot be located, the employee shall pull the ADT alarm and the internal alarm.

The employee or supervisor shall also activate the paging system, and announce that an emergency situation exists, and that all employees shall evacuate the area.

Employees, under the direction of the supervisor shall shut down processes to the extent possible.

Before evacuating, the employee or supervisor shall pass through the employee entrance, break the glass and push the electrical cut-off, next to the time clock

IN NO CASE SHALL EMPLOYEES ENDANGER THEMSELVES IN AN EFFORT TO FIGHT A FIRE.

## Explosions

The Sun Chemical facility in Kankakee, Illinois does not have an Emergency Brigade. Therefore, the employees are restricted to initial response only. If an explosion occurs, the employee shall immediately leave the area and summon the supervisor. Under the direction of the supervisor, the employee shall sound the same alarms as with a fire, and, if the situation permits, shall shut down his equipment, before evacuating.

## VI Response to Groundwater Contamination

### Spill Control and Groundwater Contamination

If a vessel or pipeline is found to leak, the employee shall:

- notify his or her supervisor,
- notify all employees in the immediate area,
- shut off all supply piping to the area, and
- start the containment and clean-up

If the leak is over 1000 lbs (138 gallons), the supervisor shall:

- call the NRC (National Response Center) at (800) 424-8802,
- call the IEMA (Illinois Emergency Management Agency at (800) 782-7860, The IEMA will connect the supervisor with the IEPA (Illinois Environmental Protection Agency) and the ESDA (Emergency Services Disaster Agency)
- call the Kankakee Municipal Utility at 933-0487 or 933-0446, if the leak reaches the sewer, and
- notify the Plant Manager, Plant Engineer, Production Manager and Maintenance Supervisor. They, in turn shall notify management in Northlake. (Phone numbers are on the Emergency Response Card.)

## VII Shutdown of Operations

The shutdown of operations at the Kankakee facility can be readily accomplished by the operator on duty. The processes are generally classified as mixing and pumping. There are no involved reactions which must be shutdown in sequence to prevent unwanted reactions. If an emergency arises, the employee shall shut down the operation in a calm, methodical manner. If the emergency is severe enough, the employee shall immediately abandon his workstation and evacuate the area. Normally, the employee shall shut down the operation only under the direction of the supervisor.

ILD 075 603 886

**EMERGENCY CONTINGENCY PLAN**

**SUN CHEMICAL  
GENERAL PRINTING INK DIVISION**

**BRANCH OR PLANT:**     **Kankakee**

**ADDRESS:**                     **3200 Festival Drive**  
**Kankakee, IL 60901**

**PHONE NO:**                    **(815) 939-0136**

**FAX NO:**                        **(815) 939-9833**

**DATE:**                            **August 18, 2000**

**\*This plan should be maintained in its own binder.**

# EMERGENCY CONTINGENCY PLAN

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## **1.0 INTRODUCTION (Definitions)**

## 1.1 PURPOSE

The purpose of the Emergency Contingency Plan is to outline basic policies and procedures to be implemented in the event of an internal or external emergency or disaster. These policies and procedures provide for:

- Employee safety
- A minimization of environmental impact.
- A minimization of the damage to the physical facility.
- Security of the facility in states of emergency.
- Process of recovery and resumption of operations.

This plan is also intended to satisfy the Contingency Plan and Emergency Procedures requirements for hazardous waste generators as specified by USEPA in 40 CFR265 Subpart D.

Copies of this plan should be placed in designated areas within the facility and should be available to local personnel/emergency coordinators required to respond to an incident while away from the facility.

## 1.2 POLICY

All Sun Chemical GPI Division plants, branches and service stations shall maintain a copy of this Emergency Contingency Plan at their sites. The need for the plan at inplant operations will be determined by the host branch's facility manager (or designee). This decision will be made based upon the nature of the inplant operation, size, quantity of material in the inplant and the existing programs of the host printer. If the inplant is a permitted waste generator a copy of this plan must be maintained.

## 1.3 SCOPE

The Emergency Contingency Plan covers all employees who are normally present in the facility that the plan has been developed for.

## 1.4 RESPONSIBILITY

It is the responsibility of the facility manager (or designee) to ensure that the information in this plan is kept current and that annual training of personnel is conducted.

## 1.5 DEFINITIONS

### Prevention - (pre-emergency)

- Preparation necessary (prior to an emergency) to conduct emergency operations.
- An analysis and ranking of the potential disaster hazards applicable to an individual facility.

- Internal audit of the systems and procedures for prevention of an internally caused disaster.

### **Immediate Response Plan - (emergency)**

The actual emergency when necessary action must be taken to protect life, property and minimize physical plant damage.

### **Recovery Period Plan**

- Evaluate damages, utilize all resources available to repair and restore operating facilities.
- Establish plan to continue to meet customer requirements during repair and restoration period.

### **Disaster**

- Internal: Caused by a malfunction, carelessness or by misuse of a dangerous substance or mechanical device contained in or near the facility such as explosion, fire, spill etc.
- External: Such as a hurricane, snow storm, flood or ice storm and/or resultant failure of utility services.
- Partial: Damage to a section or portion of a facility necessitating a partial stoppage of production.
- Major: An incident of great enough significance to cause a threat to life, or sufficient damage to warrant assistance from local, county or state civil defense or disaster organization or the complete shutdown of operations.

An incident which necessitates a complete shutdown of operations. Such a situation usually includes involvement of a local, county or state agency (fire dept., police dept., OSHA, EPA, LEPC or SERC).

## **2.0 PREVENTION**

## 2.1 EMERGENCY COORDINATORS

### Chief Coordinator

- 1) Plant Manager: John W. McBurrows

### Alternates

- 2) Plant Engineer: John Kujawa
- 3) Production Manager: Ron Klecan
- 4) Maintenance Manager: Eric Johnson
- 5) 1<sup>st</sup> or 2<sup>nd</sup> Shift Supervisor: Tom Stark/John Papineau  
3<sup>rd</sup> Shift Supervisor: Wayne Lamie

### DUTIES/RESPONSIBILITIES

- 1) Direct and coordinate all emergency and disaster activities at the facility.
- 2) Report disaster and situation to management.
- 3) If disaster occurs during the 2nd or 3rd shift, immediately contact chief coordinator or alternates in order of listing:

#### Function

*Plant Manager- John McBurrows*

*Plant Engineer – John Kujawa*

*Production Manager – Ron Klecan*

*Maintenance Mgr – Eric Johnson*

*Production Supervisor*

*1<sup>st</sup> or 2<sup>nd</sup> shift Tom Stark  
or John Papineau*

*3<sup>rd</sup> shift Wayne Lamie*

#### Home Phone No.

**Nonresponsive**



## 2.2 EMERGENCY BRIGADE

Kankakee, like most Sun Chemical GPI facilities, does not have an Emergency Brigade. Personnel are instructed in providing only initial response to emergency situations.

Personnel rely on local emergency response providers for any activities required beyond an initial response.

Plant personnel are trained in the use of emergency fire fighting equipment and have knowledge of all areas of the plant. Plant personnel are trained in the execution of proper spill procedures and notifications.

	<u>Function</u>	<u>Person</u>
Brigade Leader	N/A	N/A
<u>Assistant</u>		
1st Shift	N/A	N/A
2nd Shift	N/A	N/A
<u>Medical Personnel</u>	N/A	N/A

### Qualifications

#### As First Responders

Trained in the use of emergency fire fighting equipment for building, equipment and vehicles.

Qualified in the process of evacuating and searching.

Have knowledge of all unoccupied areas, electrical closets, ADT room, telephone panel rooms, etc., and must be able to recognize unusual or suspicious items.

Should know location of all emergency equipment - fire extinguishers, safety equipment, flashlights, etc.

### **2.3 FIRE TRAINING AND EMERGENCY DRILLS**

The following training is conducted so that employees may provide initial response, as noted in section 2.2.

- Fire extinguisher/fire safety training will be conducted annually.
- The plant will have at least one emergency drill per year. The plant will be evacuated during all drills and an emergency situation will be simulated.
- The plant will have “joint” fire drills with the local Fire Department as requested.

## 2.4 EXTERNAL AGENCIES

		<b><u>Phone Number</u></b>
Fire Department	<i>City of Kankakee</i>	<i>(815) 911</i>
Paramedics/Ambulance	<i>St. Mary's Hospital</i>	<i>(815) 937-2490</i>
Hospital	<i>St. Mary's Hospital</i>	<i>(815) 937-2490</i>
Local Health Clinic	<i>Bourbonnais Med Center</i>	<i>(815) 937-8788</i>
Police Department	<i>Kankakee County Sheriff's Dept</i>	<i>(815) 911</i>
Local State EPA Office		<i>(708) 338-7900</i>
Local POTW/Sewer Plant	<i>Kankakee Municipal Utility</i>	<i>(815) 933-0487</i>
Local OSHA Office		<i>(312) 353-2220</i>
National Response Center (NRC)		<i>(800) 424-8802</i>
Local Emergency Planning Committee (LEPC)	<i>Kankakee County Emergency Service Disaster Agency (ESDA)</i>	<i>(815) 937-8482</i>
State Emergency Response Commission (SERC)	<i>Illinois Emergency Management Agency (IEMA)</i>	<i>(800) 782-7860</i>

*Emergency calls can be placed to 911.*

## **2.5 MAJOR EQUIPMENT INVENTORY**

Information concerning all major pieces of equipment should be provided in this section.

Equipment is categorized as follows:

- 2.5.1 Shot Mills / Attritors
- 2.5.2 Mixers
- 2.5.3 Processing Tanks
- 2.5.4 Storage Tanks
- 2.5.5 Pumps
- 2.5.6 Equipment Vendors and Local Contractors

### 2.5.1 SHOT MILLS

<u>Mill #</u>	<u>Mfg.</u>	<u>Size</u>	<u>Serial #</u>	<u>Asset #</u>	<u>System</u>
1	Schold Mach	100 gal	7540-95		Black 1
2	Schold Mach	100 gal	7539-95		Black 2
3	Schold Mach	100 gal	7538-95		Blue 3
4	Schold Mach	100 gal	7537-95		Blue 4
5	Schold Mach	100 gal	7536-95		Yellow 5
6	Schold Mach	100 gal	7535-95		Yellow 6
7	Schold Mach	100 gal	7505-94		Black 7
8	Schold Mach	100 gal	7533-95		Red 8
9	Schold Mach	100 gal	7534-95		Red 9
10	Schold Mach	20 gal	7124-89		Clay 10

### ATTRITORS

<u>Attritor #</u>	<u>Mfg</u>	<u>Type</u>	<u>Serial #</u>	<u>Asset #</u>
1(SE)	Union Process	200 SDG	950103	
2(SW)	Union Process	200 SDG	950102	
3(NE)	Union Process	200 SDG	930106	
4(NW)	Union Process	200 SDG	unknown	



## 2.5.2 TANK MIXERS

<u>Mixer #</u>	<u>Mfg.</u>	<u>Size/Model</u>	<u>Serial #</u>	<u>Asset #</u>
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The mixers used in the process tanks are primarily manufactured by either Schold Machinery or Lighting Mixers. Data can be obtained through use of the PSM data or from the manufacturers' distributors where purchased.

### 2.5.3 PROCESSING TANKS

<u>Tank #</u>	<u>Type-Function</u>	<u>Capacity</u>
---------------	----------------------	-----------------

Processing tanks are described by the volumes that they may hold. This information can be obtained from the forms utilized daily by the Production Supervisors. The information in the PSM data is also limited to the volumes.

### 2.5.4 STORAGE TANKS

<u>Tank #</u>	<u>Type-Function</u>	<u>Capacity</u>
---------------	----------------------	-----------------

Storage tanks are described by the volumes that they may hold. This information can be obtained from the forms utilized daily by the Production Supervisors. The information in the PSM data is also limited to the volumes.

### 2.5.5 Process Pumps

<u>Tank #</u>	<u>Type-Function</u>	<u>Capacity</u>
---------------	----------------------	-----------------

Pumps used throughout the process are not proprietary.

## 2.5.6 EQUIPMENT VENDORS AND LOCAL CONTRACTORS

<u>Name</u>	<u>Location</u>	<u>Phone</u>	<u>Product/Service</u>
American Combustion		(773) 737-9200	Boiler repair
Allied Valve (JAY)	Chicago	(312) 226-1506	Valve repair
Advanced Millwright	Manteno	(815) 468-1440	Millwright
Borg Mech. Contract	Hillside	(708) 449-8080	Mech. Contractor
Computer Svc. Co.	Ashkum	(815) 694-2638	Cad drawings
Conversions, Inc.	Glen Ellyn	(630) 790-3355	Control Systems
(R.E.)Cooper Corp.	Bradley	(815) 937-9579	Piping, Sheetmetal
Centimark	West Chicago	(800) 233-7212	Roofing
Carbis	Florence, SC	(800) 845-2387	Bulk Unloading
Current Midwest	East Chicago	(800) 391-0109	Used Equipment
Decator Industrial Elec	Decator	(217) 428-6621	Motors/Drives
Delta Industries	S. Chicago Heights	(708) 756-2776	Air Compressors
Equiptrol	Hoffman Estates	(847) 843-7707	Valves, Inflatable
Enpro	Addison	(630) 629-3504	Level Gauges
Englewood Electric	Kankakee	(815) 933-5536	Electrical Supplies
FabEnCo	Houston	(800) 962-6111	Safety Gates
First Energy	Old Bridge, NJ	(732) 607-2700	Lighting Systems
Glade Plumbing & Htg	Kankakee	(815) 933-1796	Plumbing/Piping
Harrison Technical Svc	Richton Park	(708) 861-2849	Control Systems
Holohan Heating	Kankakee	(815) 932-5572	Htg & Sheetmetal
Joliet Equipment	Joliet	(615) 727-6606	Motors & Drives
J & S		(800) 350-3828	Air Duct Cleaning
J & A Sales		(630) 759-1122	Boiler Gaskets
JHT	Kankakee	(815) 933-5529	Architects-Structur
Johnson-Downs	Kankakee	(815) 932-2136	Gen. Contractors
Kitech	Kankakee	(815) 933-6683	Motor Sales & Svc
Liberty Fire Equip.	Bradley	(815) 937-9700	Fire Equipment
Lincolnland Coatings	Kankakee	(815) 937-9085	Painting
Langlois Roofing	Kankakee	(815) 933-8040	Roofing
Micromotion	Chicago	(312) 588-0501	Meters, Flow
Martin Asphalt	Kankakee	(815) 935-8751	Asphalt Paving
(JL) Meece Engr.	Coal City	(815) 634-2727	Engineering
MidAmerica Roofing	Romeoville	(630) 759-7500	Roofing
Marley Cooling Tower	Oak Brook	(630) 574-9424	Cooling Towers
Millenium	South Bend	(219) 234-0441	Haz Waste Remov
Newenergy Midwest	Chicago	(312) 704-9200	Nat. Gas Provider
Nalco	Chicago	(708) 496-5170	Water Treatment
OPW	Crystal Lake	(815) 356-5590	Liquid Loading
Process Sales Inc.	Addison	(630) 543-7400	
Process Electric & Comm.	Bradley	(815) 932-8304	Elect. Contractor
ProQuip	Villa Park	(630) 279-9672	Mixers, Tank
Proquip	LaGrange	(708) 352-5732	Level Gauges
Quackenbush	Crystal Lake	(815) 479-8900	Pumps Valves
Ruder Electric	Kankakee	(815) 932-8660	Elect. Contractor

#### 2.5.7 EQUIPMENT VENDORS AND LOCAL CONTRACTORS (Continued)

<u>Name</u>	<u>Location</u>	<u>Phone</u>	<u>Product/Service</u>
<i>Rosemount</i>	<i>Oak Forest</i>	<i>(708) 535-5063</i>	<i>Control Valves</i>
<i>Schold Machine Co.</i>	<i>Chicago</i>	<i>(708) 458-3788</i>	<i>Mills, Mixers, etc.</i>
<i>Southwest Town Mech</i>	<i>Orland Park</i>	<i>(708) 460-7330</i>	<i>Heating/Air Cond.</i>
<i>South Side Iron Works</i>	<i>St. Anne</i>	<i>(815) 427-8330</i>	<i>Steel Fabrication</i>
<i>Stevenson Fabrication</i>	<i>Manteno</i>	<i>(815) 468-7941</i>	<i>Steel Fabrication</i>
<i>Tousignant Inc</i>	<i>Kankakee</i>	<i>(815) 932-2824</i>	<i>Gates, Fence, Door</i>
<i>Thermohelp</i>	<i>Buffalo Grove</i>	<i>(847) 821-7130</i>	<i>Insulation</i>
<i>Williamson &amp; Co</i>	<i>Skokie</i>	<i>(847) 674-0000</i>	<i>Dust Collector</i>

## 2.6 EMERGENCY EQUIPMENT

Emergency Exits/Designated Meeting Point	Locations Noted <i>In Section 2.6.1</i>
Fire Extinguishers	Location Noted <i>In Section 2.6.2</i>
Fire Hoses	Locations Noted <i>In Section 2.6.2</i>
Fire Alarm Box	Locations Noted <i>In Section 2.6.2</i>
Main Electric Disconnect	Locations Noted <i>In Section 2.6.3</i>
Sprinkler Shut Off	Locations Noted <i>In Section 2.6.3</i>
First Aid Center and Supplies	Locations Noted <i>In Section 2.6.3</i>
Hazardous and Non-Hazardous Accumulation and Storage Areas	Locations Noted <i>In Section 2.6.4</i>
Emergency Spill Equipment	Locations Noted <i>In Section 2.6.4</i>



#### **2.6.1 EMERGENCY EXITS / DESIGNATED MEETING POINT**

**The locations of emergency exits and the designated meeting point are illustrated on the enclosed plant layout.**

**Appendix A-1**

## **2.6.2 FIRE EXTINGUISHERS, FIRE HOSES, FIRE ALARM BOX**

**The locations of fire extinguishers, fire hoses and fire alarm boxes are illustrated on the enclosed plant layout.  
Appendix A-1 and A-2**

### **2.6.3 MAIN ELECTRICAL DISCONNECT, SPRINKLER SHUT OFF, FIRST AID STATION AND SUPPLIES**

**The locations of the main electrical disconnect, the sprinkler system shut off valves and the First Aid Station and supplies are illustrated on the enclosed plant layout.**

**Appendix A-1**

#### **2.6.4 HAZARDOUS AND NON-HAZARDOUS ACCUMULATION AND STORAGE AREAS AND EMERGENCY SPILL EQUIPMENT**

**The locations of the hazardous and non-hazardous accumulation and storage areas and the emergency spill equipment are illustrated on the enclosed plant layout. Appendix A-1 and A-2**

## **2.6.5 RESERVED**



## **2.7 COMMUNICATIONS WITH LOCAL RESPONSE AGENCIES**

A copy of the Emergency Contingency Plan has been offered to local response agencies (including the local fire department, hospital and police department) that may be called upon to provide emergency services to the facility.

A copy should be offered to local response agencies when:

- Applicable regulations or internal standards change
- The physical layout of the facility changes
- The list of emergency coordinators changes
- The list of emergency equipment changes

A sample letter that can be sent to local response agencies is provided in **Appendix B**. Copies of letters sent and received are maintained in **Appendix C**.

## **2.8 SPECIFIC ARRANGEMENTS WITH LOCAL RESPONSE AGENCIES**

Any specific arrangements agreed upon with local response agencies should be identified in this section of the plan.

The only "specific arrangement" with a local response agency, involves the Kankakee Fire Department. Although not technically in their jurisdiction, the Sun Chemical facility maintains an agreement and pays an annual fee to the Kankakee Fire Department to provide assistance in any emergency regarding fire or rescue.

### **3.0 IMMEDIATE RESPONSE**

### 3.1 CHAIN OF COMMAND

The following information is provided in the event of an emergency or disaster. The senior management member present at the time of an emergency will assume full authority until relieved by a management superior. Following is the chain of command with addresses and telephone numbers. Attached you will find procedures for handling emergencies.

**Plant Manager**

*John McBurrows*

**Nonresponsive**

**Plant Engineer**

*John Kujawa*

**Nonresponsive**

**Production Manager**

*Ron Klecan*

**Nonresponsive**

**Maintenance Supervisor**

*Eric Johnson*

**Nonresponsive**

**Lab Manager**

*Jack Miller*

**Nonresponsive**

**NOTE: IF UNAVAILABLE TO LOCATE - CALL EITHER:**

Carl Raycroft  
Division Group Lead  
Environment & Safety  
Northlake, IL 60164  
Office: (708) 562-0550 ext 2432  
Home: **Nonresponsive**

Craig J. Tompkins  
Vice President  
Engineering & Manufacturing  
Northlake, IL 60164  
Office: (708) 562-0550 ext 2213  
Home: **Nonresponsive**

### **3.2 LEADERSHIP AT THE SCENE**

Leadership at the scene will be provided by the most senior ranking management personnel as specified in Section 3.1 Emergency Coordinators of this plan.

On-site lead supervisor will assume control until leadership specified in Section 3.1 is notified and at the scene.

### 3.3 EMPLOYEE ROSTER

#### SUN CHEMICAL – GPI DIVISION KANKAKEE

Name	Home Phone #
<i>Bleich, Damon</i>	Nonresponsive
<i>Brewster, Larry</i>	
<i>Breymeyer, Brad</i>	
<i>Burse, Viola</i>	
<i>Carlson, Glen</i>	
<i>Carlson, Nan</i>	
<i>Carranza, Jesus</i>	
<i>Carroll, Rodney</i>	
<i>Cotsones, Robert</i>	
<i>Dell, Kathleen</i>	
<i>Donaldson, Carl</i>	
<i>Down, Charles</i>	
<i>Gertsch, Donna</i>	
<i>Grace, David</i>	
<i>Grizzle, Mike</i>	
<i>Harper, Jimmy</i>	
<i>Heagle, Jeffery</i>	
<i>Henson, Janice</i>	
<i>James, John</i>	
<i>James, Jimmy</i>	
<i>Johnson, Eric</i>	
<i>Kellogg, Terrance</i>	
<i>Klecan, Ron</i>	
<i>Konitz, Tom</i>	
<i>Kujawa, John</i>	
<i>Kupferer, Rich</i>	
<i>LaGesse, Dennis</i>	
<i>Lamie, Wayne</i>	
<i>Lynch, Debra</i>	
<i>Martell, Chad</i>	
<i>Mayer, Wade</i>	
<i>McBurrows, John</i>	



### 3.4 EMPLOYEE ROSTER (Continued)

#### SUN CHEMICAL – GPI DIVISION KANKAKEE

Name	Home Phone #
Miller, Jack	Nonresponsive
Morrison, Daniel	
Myroup, Joan	
Neckopulos, Mike	
Nickles, Ron	
O'Keefe, Ora Lee	
Papineau, Douglas	
Papineau, John	
Patnaude, Jerald	
Pelehowski, Brian	
Pfantz, Scott	
Pigusich, Gerald	
Reilly, Brian	
Selk, Dennis	
Smith, Monty	
Stark, Thomas	
Summer, Jason	
Swartz, Larry	
Wallace, Rickey	
Warchol, Helen	
Welker, Troy	
Widdowson, George	
Wood, Roger	
Wright, Carl	
	( )- -
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	( )- -

### 3.4 PUBLIC RELATIONS/MEDIA COMMUNICATIONS

If an incident occurs in which public relations issues are expected and media communications are foreseeable, the ranking emergency coordinator will contact the Corporate Communications Group at the For Lee, NJ Corporate Headquarters.

<u>Corporate Communications Group:</u>	<u>Office</u>	<u>Home</u>
Marc Frankel	(201)224-4600 ext. 281	Nonresponsive
Laura Samuels	(201)224-4600 ext. 258	Nonresponsive

Any statements or interviews given to the media (newspaper press, radio, television, reporters) will be provided through the Corporate Communication Group or their designated onsite representative. All employees should be advised of this protocol as a part of contingency training.

The Emergency Communications Plan in **Addendum** can be referenced for additional information.

### 3.5 DIVISIONAL/CORPORATE NOTIFICATION PROCEDURES FOR MAJOR EMERGENCIES AND ENVIRONMENTAL INCIDENTS

#### Definitions

##### A. Emergency (non-environmental)

1. Severe Bodily Injury - Fatality, major crippling injury including amputation and cases where 3 or more people are injured at the same time.
2. Major Property Damage - From fire, explosion, flood, windstorms or any other cause if total repair costs are estimated to be over \$25,000. This does not include damage to vehicles.
3. Civil Disorder - Riots, bomb threats, forcible entry and hostage taking.

##### B. Environmental Release

Any spill, leak or other release or the discovery of a sub-surface quantity of a material (vapor, liquid, dust, solid) in any quantity. This includes both hazardous and non-hazardous materials. If the material is a regulated hazardous substance reporting to local, state or federal agencies may be required. Any release of material which results in complaints from neighbors.

#### Notification Procedures

In case of any incident defined above, any divisional or location representative who has key information will notify Divisional/ Corporate personnel identified in this section. The individual notified will notify other members of Divisional and Corporate Management as required. Each location should develop its own internal procedure for notification. Incidents are to be reported as soon as possible, but not more than 4 hours after the occurrence.

Carl Raycroft  
Division Group Lead  
Environment & Safety  
Northlake, IL 60164  
Office: (708) 562-0550 ext 2432  
Home: **Nonresponsive**

Craig J. Tompkins  
Vice President  
Engineering & Manufacturing  
Northlake, IL 60164  
Office: (708) 562-0550 ext 2213  
Home: **Nonresponsive**

All statements or interviews given to the media will be provided through the Corporate Communications Group in Fort Lee or their designated representative. Statements given to Federal or State governmental environmental agencies or OSHA/safety agencies should be approved with the Manufacturing Services Environmental and Safety group in Northlake.

### Phone Chain Sequence

C. Severe bodily injury, major property damage, civil disorder or environmental release.

#### 1st Attempt:

Carl Raycroft – Division Group Lead, Environment & Safety  
Northlake Office..... (708) 562-0550  
ext. 2432

Home..... **Nonresponsive**

#### 2nd Attempt:

Craig J. Tompkins - Vice President of Engineering & Manufacturing  
Northlake Office..... (708) 562-0550  
ext. 2213

Home..... **Nonresponsive**

#### 3rd Attempt:

Gary M. Andrzejewski - Corporate Dir. of Environmental Compliance  
Northlake Office..... (708) 562-0550  
ext. 2313

Home..... **Nonresponsive**

### 3.6 SAFETY AND SECURITY

<u>Job Title</u>	<u>Name of Employee</u>
Plant Manager (or Designate)	<i>John McBurrows</i>
<u>Designates:</u>	
Plant Engineer	<i>John Kujawa</i>
Production Manager	<i>Ron Klecan</i>
Maintenance Supervisor	<i>Eric Johnson</i>
Lab Manager	<i>Jack Miller</i>

#### DUTIES AND RESPONSIBILITIES

- Responsible for the safe and orderly evacuation of affected area or areas. Responsible for conducting a personnel inventory.
- Direct fire department and other outside help to the affected location or locations.
- Responsible for plant security during and after the emergency including establishing a personnel watch and a fire watch if necessary.
- Responsible for initiating the investigation of the emergency; securing eyewitnesses accounts, and recording all pertinent information at or immediately after the time of the occurrence.
- Photograph damaged areas to help in the investigation.

### 3.7 TRAFFIC

<u>Job Title</u>	<u>Name of Employee</u>
Plant Manager (or Designate)	<i>John McBurrows</i>
<u>Designates:</u>	
Warehouse Supervisor	<i>Carl Donaldson</i>
Production Manager	<i>Ron Klecan</i>

#### DUTIES AND RESPONSIBILITIES

- Contact railroad for removal of tank cars if necessary.
- Coordinate clearing all roadways, loading docks, aisle ways of trucks, cars, drums etc., that would in any way obstruct the fire department, emergency responders, etc. in their efforts to handle the emergency.
- Provide personnel assigned to lift trucks during recovery period.
- Account for all Shipping and Receiving personnel and report to safety section.



### 3.8 PRODUCTION

#### Job Title

#### Name of Employee

Plant Manager (or Designate)

*John McBurrows*

#### Designates

Production Manager

*Ron Klecan*

Shift Supervisor

*Tom Stark  
John Papineau  
Wayne Lamie*

Plant Engineer

*John Kujawa*

#### DUTIES AND RESPONSIBILITIES

- Responsible for shut down of all equipment.
- Check that all valves are in proper setting for shut down.
- Account for all personnel in Production Departments and report to the safety section.

### 3.9 MAINTENANCE

<u>Job Title</u>	<u>Name of Employee</u>
Plant Manager (or Designate)	<i>John McBurrows</i>
<u>Designates</u>	
Maintenance Supervisor	<i>Eric Johnson</i>
Production Manager	<i>Ron Klecan</i>
Plant Engineer	<i>John Kujawa</i>
Production Foreman	<i>Tom Stark</i> <i>John Papineau</i> <i>Wayne Lamie</i>

#### DUTIES AND RESPONSIBILITIES

- Responsible for closing or opening critical valves and switches under their jurisdiction.

<u>Item and Location</u>	<u>Person Responsible</u>
Electrical Disconnect	<i>Eric Johnson</i>
Oil Valves	<i>Ron Klecan</i>
Gas Valves	<i>Eric Johnson</i>
Water Valves	<i>Eric Johnson</i>

- Maintain all utility services where possible.
- Restore any lost utility as fast as feasible that may add to the safety of the plant.
- Initiate emergency repairs where necessary.
- Furnish necessary emergency supplies and mechanical equipment.
- Responsible for conducting damage survey of emergency areas for unsafe conditions and damages.
- Account for all Maintenance personnel.
- Contract with outside contractors as needed or directed by engineering.

### 3.10 MEDICAL

<u>Job Title</u>	<u>Name of Employee</u>
Plant Manager (or Designate)	<i>John McBurrows</i>
<u>Designates</u>	
Production Foreman	<i>Raul Fernandez</i>
Office Manager	<i>Peter Guido</i>

#### DUTIES AND RESPONSIBILITIES

- Responsible for obtaining medical assistance if needed in the facility.
- Responsible for coordinating care of the injured and directing medical assistance to injured personnel.
- If possible, check all employees from affected area for possible injury before they are permitted to leave the plant area. This should not unduly delay seriously injured persons on the way to the hospital.

### 3.11 EVACUATION INSTRUCTIONS

- Notify chief coordinator who will be responsible for the following:
- Announce fire and location on P.A. system.
- Pull alarm box (reference Section 2.6.2)

*Note: If an incident has resulted in the activation of a sprinkler system, an alarm will sound automatically.*

- Call fire department - Phone (911)
- Plant evacuation plan
- Meet at designated area (reference Section 2.6.1)
- Do not move cars or trucks in parking lot. This could interfere with emergency response efforts.

### **3.12 BOMB THREAT EMERGENCY PLAN**

Threats may be received at a plant by telephone, by mail, or in person. Personnel likely to receive such threats should be fully briefed on their duties to report immediately such threats to designated plant officials. Personnel that may receive such threats are:

Telephone Operators  
Receptionists  
Mail Room Personnel  
Office Staff

If a bomb threat is received by a telephone operator or others, the following procedure should be followed:

- 1) Complete Bomb Threat Information Sheet noting the time of the call and the exact wording of the message received, and the time the bomb is suppose to explode. See page 40.
- 2) Contact the emergency coordinator or refer to the chain of management and relay the message.
- 3) Take no further action unless directed to do so and do not discuss the matter with other employees.

The action to be taken will be decided by the senior management member identified by the chain of command. Proper evaluation of the threat depends on the circumstances surrounding each threat. The objective is to provide maximum protection for company personnel.

The senior management member will notify the local Police Department by phone advising them of the threat received. Any request for a Demolition Squad to report to the scene should be made by the Police Department.

- 4) If bomb threat is considered valid or if an evacuation is ordered by the police department:
  - a) Announce emergency evacuation over the P.A. system
  - b) All personnel are to shut off equipment, vacate building in an orderly fashion and meet at the designated area.
  - c) Emergency coordinator to conduct a personnel inventory.
- 5) Do not re-enter the building until directed by the Police or senior management member.

**BOMB THREAT INFORMATION SHEET**

DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

PLACE: \_\_\_\_\_

OUTSIDE LINE: \_\_\_\_\_

INTERNAL EXTENSION: \_\_\_\_\_

EXACT MESSAGE RECEIVED: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**IF BOMB OR EXPLOSIVE:**

WHERE: \_\_\_\_\_

WHEN: \_\_\_\_\_ TIME: \_\_\_\_\_

TYPE OF EXPLOSIVE: \_\_\_\_\_

WHY: \_\_\_\_\_

**WHO THE CALLER IS:**

NAME (if given): \_\_\_\_\_ FEMALE: \_\_\_\_\_ MALE: \_\_\_\_\_

VOICE: Pitch of Voice: \_\_\_\_\_ LOW: \_\_\_\_\_ MODERATE: \_\_\_\_\_ HIGH: \_\_\_\_\_

**SPEECH CHARACTERISTICS:**

Stuttering: \_\_\_\_\_

Unusual Accent: \_\_\_\_\_

Peculiar Grammar: \_\_\_\_\_

Other: \_\_\_\_\_

**WHERE THE CALLER IS:**

Background and level of noise: \_\_\_\_\_

\_\_\_\_\_

OTHER HELPFUL INFORMATION: \_\_\_\_\_

\_\_\_\_\_

ACTION TAKEN (Who was notified, etc.): \_\_\_\_\_

\_\_\_\_\_

NAME: \_\_\_\_\_



### 3.13 SPILLS AND HAZARDOUS EMISSIONS

#### Internal Spills

- 1) All personnel are to notify the emergency coordinator as soon as practically possible upon discovery of a spill.
- 2) Responding trained personnel are to identify the spilled material and then if possible, initiate appropriate control, containment and clean-up activities.
- 3) The emergency coordinator will immediately go to the spill area and determine additional actions, if any, to be taken.
  - a) Determine if evacuation of an area of the facility is necessary.
  - b) Direct containment and clean up process, with available personnel or coordinate with emergency response contractor.
  - c) If additional help is required in containment, or clean up, the response personnel or emergency coordinator should call an emergency response contractor.

This facility has an agreement with the following contractors to provide emergency response services:

<u>Contractor</u>	<u>Phone Number</u>
<i>Heritage Environmental Services</i>	<i>(800) 48-SPILL</i>
<i>Superior Special Services, Inc.</i>	<i>(630) 257-7540</i>

- 4) Emergency coordinator will contact the fire department if deemed necessary.
- 5) Emergency coordinator to notify management as per the Divisional/ Corporate Notification Procedures identified in Section 3.5.
- 6) Notify appropriate agencies police, fire, EPA, sewer, LEPC, SERC, NRC etc.

- 7) In the event of a discharge to the land or waters of the state, the *local EPA* will be notified.

The notification is to occur after completing the Divisional/Corporate Notification Procedures specified in Section 3.5. The local EPA shall be telephoned at (708) 338-7900. If this number is inoperable, the *State Police* shall be telephoned at (815) 698-2315.

This notification shall include, but not be limited to, the following information:

1. The name, title, affiliation, address and telephone number of the person reporting the discharge;
2. The location of the discharge, with as much specificity as the agency requests, and in any event with sufficient specificity to enable the agency to direct its agents and employees and any other person to the discharge site, including:
  - i. For discharge from sites located on land, the name of the site, the street address, the municipality, and the county;
  - ii. For discharges on, under or into water, the name of the water body, location of the discharge with reference to a fixed point or points, and a description of the area which the discharge may reach;
3. The common name of the hazardous substance(s) discharged;
4. An estimate of the quantity of each hazardous substance discharged, including best estimates if the quantities are unknown;
5. The date and time at which the discharge began, the date and time at which the discharge was discovered, and, if the discharge has ended, the date and time at which it ended;
6. The actions taken to contain, clean up and remove the hazardous substance(s) discharged; and
7. The name and address of any person responsible for the discharge.

### **Emissions**

All personnel are responsible for controlling plant emissions. In the event of an unavoidable mechanical failure, malfunction or emergency, it is imperative that emergency coordinators be notified immediately of the situation. The most senior ranking emergency coordinator will determine if an evacuation of the work area is necessary and if assistance is required from emergency response agencies.

Proper corrective actions should be initiated as quickly as is safely possible.

The emergency coordinator will complete the Divisional/Corporate Notification Procedures specified in Section 3.5.

### **External Spills/Rail**

If a rail spill occurs while the car is in transit and the facility is contacted by the railroad, the call should be directed to an emergency coordinator. The emergency coordinator will initiate the Divisional/ Corporate Notification Procedures specified in Section 3.5.

If a rail spill occurs on our rail siding, procedure is to be the same as the "Internal Spill".

### **External Spills/Truck**

If a truck spill occurs while the truck is in transit, driver will notify the plant office and the emergency coordinator is to be notified immediately. The emergency coordinator will activate the Divisional/ Corporate Notification Procedures. If the plant is not open and an emergency coordinator can not be contacted at home, the driver should notify the emergency number identified on the shipment's bill of lading. The Corporate Traffic Department at the Sun Chemical Fort Lee, NJ offices should also be contacted concerning any governmental agency reporting issues.

Follow procedures specified in Section 3.5 and, if necessary, contract with the emergency response contractor identified in this section. If the truck spill occurs on Plant property, procedure is to be the same as "Internal Spill".

### **Available Spill Containment and Clean-Up Equipment Available**

This facility maintains spill containment and clean-up equipment on site.

### **3.14 SEVERE NATURAL DISASTERS**

#### **Ice Storm, Snow Storm, Tornado, Wind Storm**

News reports should be relied upon for information. A watch indicates that conditions are favorable for a natural disaster to occur. A warning indicates that a natural disaster has occurred in the general area.

- 1) Under the direction of the Plant Manager, all moveable objects outside the plant, should be brought indoors or fastened down.
- 2) All the facility's windows, doors, vents, skylights, etc. should be closed and secured.
- 3) Prepare for possible plant shut down.
- 4) If plant is shut down, provide for appropriate personnel watch if necessary.

#### **Flooding**

Flooding usually is a slow process with adequate warning. The buildup to flood conditions normally (except in flash floods) takes several days, and progressive situation reports are typically available from news reports. Flash flood warnings are the most urgent.

#### ***WHAT TO DO WHEN FLOODING BECOMES A POSSIBILITY***

- 1) If a flood watch is called for place emergency services on standby; alert supervisors, employees and others as necessary including division/corporate notification (Section 3.5).
- 2) Inform everyone of precautionary measures being taken or to be taken to safeguard lives and property.
- 3) Assess situation; determine potential risk area; estimate rise of water based on flood watch notification; initiate two-way reports between mutual aid plants and utilities.
- 4) Secure any outside storage that might be impacted by floodwaters.
- 5) Maintain contact with the area forecast and warning office or continue to monitor weather reports.

### **When a Flood Warning is Received and Flooding is Imminent**

- 1) Mobilize emergency services (security, fire, health, etc.) and conduct facility safeguard operations (sandbagging, moving equipment, materials, and products to safer places).
- 2) Set up protection patrols.
- 3) Release everyone with homes in possible flood areas.
- 4) As necessary, effect shutdown and evacuation of personnel.
- 5) Conduct rescue operations as necessary.

### **Earthquakes**

Earthquakes are unpredictable and strike without warning. They may range in intensity from slight tremors to great shocks, and may last from a few seconds to as long as 5 minutes. Shocks could come in a series over a period of several days. The actual movement of the ground in an earthquake is seldom the direct cause of injury or death. Most casualties result from building collapse or falling objects. Disruption of landline communications - along with light and power lines, gas, sewer, or water mains - can be expected. Earthquakes may also trigger landslides and generate tidal waves - called "tsunami". The latter can cause great damage along shorelines - even up to thousands of miles away.

### **When an Earthquake Occurs**

- 1) Shut off all valves and equipment
- 2) Shut off all power utilities as specified in Section 3.9 of this plan.
- 3) Evacuate the facilities
- 4) Take inventory of personnel
- 5) Notify management as per the Divisional/ Corporate Notification Procedures (Section 3.5)

If the quake is deemed to be a minor occurrence and no visible damage found, resume operations.

If the quake is deemed severe await professional assistance and guidance before re-entering the facility.

### 3.15 LABOR STOPPAGE

#### Labor Stoppage Resulting From Work Force "Walking Off The Job"

- 1) Local Managers and Supervisors will check to see that all equipment, valves etc. have been turned off and that the facility is secure.
- 2) Local management will notify Divisional Management and Human Resources Department.

		<u>Work</u>
VP Manufacturing & Engineering	Craig J. Tompkins	(708) 562-0550 ext 2213
Human Resources Manager	Nancy Vondrak	(708) 496-5882
Director of Human Resources	Rich North	(708) 562-0550 ext 2335

If labor stoppage occurs on 2nd or 3rd shift, the Shift Supervisor will immediately call the Plant Manager.

- 3) Notify Police if deemed necessary by Local Management.
- 4) Plant Manager will determine whether security guards are necessary.
- 5) Obtain direction from divisional management and the Human Resources Department.



### **3.16 POWER FAILURE**

#### **Complete Power Failure**

- 1) Shut off all valves and switches on operating equipment.
- 2) Check all auxiliary and emergency lighting for proper operation.
- 3) Call local utility to determine extent of problem.  
Call local management as per the chain of command.
- 4) Notify management as per the Divisional Corporate Notification Procedures (Section 3.5)

#### **Reduced Power Situation (Brown Out)**

- 1) Report the problem to Plant Manager.
- 2) Complete shutdown of all air conditioners and unnecessary lights and equipment.
- 3) Equipment to be systematically throttled back or shut down at the direction of the Plant Manager, or a designated Supervisor ONLY.
- 4) All personnel should remain at the plant until they are released by their respective Supervisor.

## **4.0 RECOVERY PERIOD**

#### 4.1 RECOVERY PLAN EVALUATION

This section of the plan covers the period following the immediate response to a disaster when attention must be given to addressing the continuity of operations and maintenance of business.

Under the direction of the Plant Manager, a quick assessment will be made of the extent of the damages to both the facility and equipment; using the following outline.

- 1) Take a physical inventory of all raw material and finished goods.
- 2) Assess status of operating equipment and plant facilities.
- 3) Determine availability of work force.
- 4) Determine status of open orders and anticipated orders.
- 5) Prioritize the open orders.
- 6) Evaluate ability to distribute the product.
- 7) Evaluate ability to meet current and anticipated order requirements.

If it is determined that the damaged facilities cannot meet current and anticipated customer requirements, the **MAJOR DISASTER PLAN** specified in Section 4.2 is to be activated.

## 4.2 MAJOR DISASTER PLAN

### Major Disaster Management Team:

The disaster team will be responsible for coordinating functions as a means to satisfy customer requirements during the recovery period.

<b>FUNCTION</b>	<b>PERSON</b>	<b>ALTERNATES</b>
Coordinator	<i>John McBurrows</i>	<i>Ron Klecan</i>
Operations	<i>John McBurrows</i>	<i>Ron Klecan</i>
Sales & Marketing	<i>Chris Morrissey</i>	<i>Ken Todd</i>
Technical	<i>Ken Todd</i>	<i>Liz Scherer</i>
Manufacturing	<i>Ron Klecan</i>	<i>Eric Johnson</i>
Engineering	<i>John Kujawa</i>	<i>Craig Tompkins</i>
Shipping/Receiving	<i>Carl Donaldson</i>	<i>Ron Klecan</i>
Human Resources	<i>Richard North</i>	<i>Nancy Vondrak</i>

### Optional Offsite Headquarter Locations

*Lee's Inn / Kankakee*

Phone: (815) 932-8080

*Hampton Inn*

Phone: (815) 932-8369

### Duties and Responsibilities of Major Disaster Management Team Personnel

#### Coordinator

- 1) The coordinator will contact all members and/or alternates of the Major Disaster Management Team and establish the headquarters at either the facility or an optional offsite headquarters location.
- 2) Upon arrival of the team, determination should be made concerning which other personnel should be contacted.
- 3) Coordinate all activities of the recovery program.

### **Operations**

- 1) Evaluate whether product can be manufactured and distributed from the impacted facility and if additional resources must be called on.
- 2) If additional resources are required, activate the plan to draw from:

<b><u>Plant</u></b>	<b><u>Type on Ink</u></b>
Regional Branches	All
Hopkinsville/ Frankfort/ Burlington	Web Offset
Maumee/Bakersfield	Corrugated
Charlotte/Philadelphia/Linden/Winston Salem Fairchild/Winston Salem Regent	
Northlake/Brampton	Liquid Inks
Neenah	Sheet Fed
Franklin	Energy Curable
Kankakee	Publication Gravure

- 3) If sources outside of Sun Chemical are to be used (U.S.P.I., Huber, Flint Ink) - M. Odiotti, M. Murphy or B. Bergey must be contacted for approval prior to outsourcing.

### **Sales and Marketing**

- 1) Determine the status of all open orders by obtaining duplicate copies of orders and review with Distribution Personnel.
- 2) Define and reach consensus on priorities and review a timetable of dates by which orders will be met.
- 3) Will determine the best methods for contacting customers. Once this has been determined communicate plans with customers.
- 4) In the event that sales are lost or extra expense is incurred to meet customer needs, Business Interruption Insurance may apply. Coordinate all special and specific record-keeping requirements, with Corporate Insurance Personnel.

### **Technical**

- 1) Work with manufacturing to determine condition of raw materials and finished goods.
- 2) Contact the Director of MIS in Northlake for restoration of all formula data sheets.
- 3) Assess damage to plant laboratory facilities and supervise the repair/replacement of all lab equipment.
- 4) Assist Sales and Marketing as to alternate or substitute products and formulations for customers.





### **Manufacturing**

- 1) Take physical inventory of all raw materials and finished goods.
- 2) Determine condition of the facility and with assistance of GPI Engineering, restore the facility to operational condition in shortest time possible.

### **Engineering**

- 1) Assist manufacturing in restoring the facility to operational condition in shortest time possible.
- 2) Address any outstanding environmental or safety issues. Obtain assistance from the Manufacturing Services Environmental and Safety Group if necessary.
- 3) Review condition of equipment and arrange for inspections and repairs by outside contractors.
- 4) Maintain cost records for insurance purposes and coordinate with Corporate Insurance personnel.
- 5) Take pictures after the disaster to document site conditions.

### **Shipping/Receiving**

- 1) Review status of all orders and recent shipments and supply information as requested by Sales and Marketing.
- 2) Determine condition of truck and rail facilities for distribution.
- 3) Work with Sales and Marketing in directing distribution equipment.

### **Human Resources**

- 1) Responsible for advising all personnel of situation and of the benefits available to them during the business interruption period.
- 2) Work closely with the members of the Major Disaster Management Team and union officials in providing employees required during the recovery process.
- 3) Receive time records of employees involved in the recovery and submit to payroll and office records area.
- 4) Work with the coordinator and office manager to arrange for whatever clerical assistance may be required to handle normal office operating functions and paper work.

#### 4.3 FACILITY CONTRACTORS

<u>Electrical</u>	<u>Office</u>	<u>Phone</u>	<u>Person to Contact</u>
<i>Ruder Electric</i>	<i>(815)932-8660</i>	<b>Nonresponsive</b>	<i>Dave Ruder</i>

<u>Mechanical</u>	<u>Office</u>	<u>Phone</u>	<u>Person to Contact</u>
<i>Schold Machine</i>	<i>(708) 458-3788</i>		<i>Bob Banks</i>

<i>Glade Plumbing &amp; Heating</i>	<i>(815) 933-1796</i>		<i>Robert Glade</i>
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<i>Holohan Heating &amp; Sheet Metal</i>	<i>(815) 932-5572</i>	<b>Nonresponsive</b>	<i>John Arrington</i>
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<u>Building/Structural</u>	<u>Office</u>	<u>Phone</u>	<u>Person to Contact</u>
<i>Johnson-Downs</i>	<i>(815) 932-2136</i>		<i>Sid Downs</i>

**ADDENDUM**

**EMERGENCY COMMUNICATIONS PLAN/MEDIA COMMUNICATIONS**

# EMERGENCY COMMUNICATIONS PLAN

## FORT LEE, NJ

### INTRODUCTION

Emergency situations, by their very nature, are unexpected, inconvenient and disruptive. Because their consequences may extend beyond the plant or office location, they are also very often matters of public interest. Therefore, the types of emergencies covered by the Emergency Contingency Plan will sometimes be of legitimate interest to the news media.

Accurate news stories, released to the public as soon as possible after an emergency or a disaster at one of our locations, are in Sun Chemical's best interest. Inaccurate stories foster community fears, generate rumors, result in undue and unnecessary government scrutiny, and can seriously impact our relations with suppliers and customers who are concerned about their continuing business with our company.

Sun Chemical's management, therefore, wants to insure that supplying accurate accounts expeditiously to the media about the non-confidential aspects of company-related emergencies will mark future relations between our divisional and location managers and media representatives. To this end, the following Emergency Communications Plan has been developed by the Corporate Communications Department. As an appendix to the Emergency Contingency Plan, it is to be used as a guide when an emergency situation involves media contact.

### Media Relations in Emergency Situations

#### Corporate Emergency Communications Policy

In emergency or crisis situations involving a Sun Chemical operation, the company's general policy is to provide news media, as expeditiously as possible, with full and accurate information, based on verifiable facts.

Such information, however, must be consistent with the safety of all Sun Chemical personnel, with the security of company property and with the confidentiality of operations. When dealing with media representatives, an attitude of honesty, reasonableness and cooperation should be maintained at all times.

#### Responsibilities

##### *Corporate Communication Department*

This department, located at the executive offices in Fort Lee, New Jersey, is Sun Chemical's principal contact with the media. It is responsible for developing and monitoring the Emergency Communications Plan. It also counsels operating management in matters relating to media relations and should be contacted whenever emergency or crisis situations arise or if advice is required.

Your contacts at Fort Lee are as follows:

Marc Frankel, Director of Corporate Communications - Office - (201) 224-4600, ext 281; Home - **Nonresponsive**. If not available, contact: Laura Samuels - Office (201) 224-4600, ext 258; Home - **Nonresponsive**

### ***Corporate Counsel's Office***

This office provides legal counsel in matters relating to emergency and crisis situations, and is also located at Fort Lee. It provides required legal clearance for all prepared statements being released to the media from a Sun Chemical source. Contact: Mel Cox (Office: 201-224-4600, ext. 270; Home: **Nonresponsive**).

## **Staffing**

### ***Designated Spokesperson***

A member of the location's staff will have been designated as its official spokesperson, with responsibility for dealing with the media in emergency or crisis situations. All spokespersons will also have a designated backup. The spokesperson, who should not be the location manager, unless no one else is available, should have the competence and authority to deal directly with members of the media, and preferably be someone already known to them. The spokesperson should also be responsible for instructing other emergency communications staff members as to their responsibilities, and for maintaining an up-to-date and readily accessible list of local media personnel (press, news services, television and radio stations, etc.). It is preferable that the spokesperson live near the plant, so as to be readily available at all times.

### ***Locations Emergency Communications Support Staff***

To assure proper coverage should an emergency be of long duration, enough emergency communications support staff to work in shifts should be designated in advance. For larger locations, members of the support staff may include any of the following:

Administrative assistant, whose responsibilities would include maintaining an emergency communications center, contacting members of the support staff to report in, and monitoring the flow of information from the emergency or crisis point to the spokesperson.

Phone personnel, whose responsibilities would include receiving, recording and forwarding to the emergency communications center any inquiries from the media.

Gate Personnel, whose responsibilities would include meeting media representatives upon their arrival at the plant and escorting them to designated assembly areas during their stay. Media personnel usually are not admitted to company facilities except with the approval of the Division General Manager or his alternate. Note: Guards at gates should be instructed to contact the designated spokesperson whenever representatives of the media arrive.

Courtesies (one or more), to relay developments from the site of the emergency to the emergency communications center.

Casualty supervisor, to act as liaison with next of kin and with local hospital, in instances when there are injured or dead.

## **Pre-emergency Training**

Instructing personnel: All personnel should be instructed that only the spokesperson (or alternate) is authorized to speak to media representatives and that they should not volunteer information to media representatives during or after an emergency situation. This is particularly important if injuries or deaths have occurred, since this information should not be released to the media until after the families of those involved have been notified, and then only by the designated spokesperson (or alternate).

### ***Emergency Communications Center***

This center, from which the designated spokesperson will operate, should be located away from any possible disaster area. If practical, it should be equipped with telephones, typewriters, office supplies, desks and other necessary furniture, including cots in case of extended emergencies. Other possible supplies should include safety apparel, flashlights or other emergency lighting, walkie-talkies to use if telephones don't work, and a small, separate power source. If practical, telephones in the center should operate independently of the location's switchboard, since the plant system might be inoperative or jammed with incoming calls. The center can function as the area to which media representatives are brought upon arrival at the site, both as a control measure and because it is where bulletins would be issued during an emergency situation.

Note: During preliminary planning, an alternate site for the center should also be selected, in case the first choice should be affected by the emergency.

## **General Guidelines for Dealing with the Media**

### ***Background Information for the Media***

Fact sheets, containing the following information, should be prepared in advance for distribution to the media. These will serve to answer the most usually asked questions and will minimize the need for media representatives to enter the area where the emergency occurred--

- a. A brief history of the plant and what products it makes.
- b. Names of the plant manager, other key personnel and that of the spokesperson.
- c. Number of employees, both total and by shifts.
- d. Such other authorized information concerning the location, its personnel or its operations which would be of general interest to the media.

Note: Fact sheets should be reviewed periodically to assure the information is up to date. Copies, and all subsequent updates, should be sent to the Corporate Communications Department at Fort Lee, NJ to assist them in dealing with the press, should inquiries be directed there concerning an emergency situation.

***Preparing a brief, factual statement for the media when an emergency occurs:***

The spokesperson, after consulting the plant manager and appropriate Divisional and Corporate Engineering authorities, should prepare a short, concise statement concerning the releasable facts about what has occurred. After agreement as to the content and its accuracy, the statement must be cleared with both the Corporate Counsel's Office and the Communications Department, both in the Fort Lee offices. Once cleared, the spokesperson should then immediately contact the media, rather than waiting for them to make the first contact. The spokesperson should be careful not to offer additional information beyond what has been approved, but should promise to provide additional facts as they become available.

*Note: Do not play favorites. Give the same information and degree of cooperation to all media.*

***Direct contact with the media***

Whether talking to media representatives on the phone or face-to-face, they should be treated courteously and given whatever assistance possible, consistent with the demands of the emergency, company policy, location security and the public welfare. For their protection and to maintain security and confidentiality, media representatives should not be granted access to the emergency site. The reasons for denying access should be clearly explained.

*Note: Media representatives operating outside of the company property should never be interfered with in any way. Reports or photos of location personnel interfering with or threatening media representatives will probably cause more problems than any unwanted coverage or photo.*

***Fact Gathering***

It is important that spokespersons and location managers understand what types of information the media wants. In its simplest form, the information should answer such basic questions as: What occurred? When did it happen? What personnel were involved? Enough detail should be provided to minimize additional questions and later call-backs. Tell what you can, after appropriate clearances, but the following kinds of information are not to be discussed:

- a. Do not speculate as to cause
- b. Do not assess extent of damage in dollars
- c. Do not attempt to place blame
- d. Do not accuse anyone of negligence
- e. Do not discuss injuries or deaths until families have been properly notified
- f. Do not discuss any facts relating to insurance, such as amounts or terms of coverage, name of carrier, possibility of settlements or of reimbursements



*Only after proper authorization...*

by division and corporate authorities, should the following information be released to the media:

- a. Monetary estimates of damage
- b. Estimate when production will be resumed
- c. After the release of the names of any injured or dead, details concerning their job and family status
- d. Details of efforts being taken to confine or terminate any continuing threats posed by the emergency situation.
- e. Details concerning materials used in the manufacturing process, especially those which might be hazardous or toxic.

*Note: This information probably will have been given to local emergency response departments (fire, police, health, etc.) to assist them in their duties during the emergency. The spokesperson should have discussed with these agencies in advance of any emergency situations how, when and by whom this information should be released to the media.*

#### ***Communicating with Other Groups***

- 1) Employees: To lessen their anxieties about their jobs and to control rumors, employees both on and off duty should be given the same information that has been released to the press, as simply and directly as possible. They should also be reminded that only the location's designated spokesperson is authorized to speak with the media. If the emergency causes the location to suspend operations, you may need to reach employees not at work through an announcement sent to the local radio and/or television station.
- 3) Local Community: Keep local officials and community leaders informed of what has occurred and what remedies are being instituted. If the location is in a residential area, it may be good policy to send an informed representative around the neighborhood to assure residents that the situation is controlled, by explaining what is going on and by answering any questions.
- 3) Customers and Suppliers: Follow the procedures in the Emergency Contingency Plan.

#### **Conclusion:**

For the most part, this Emergency Communications Plan depends upon adequate prior planning and the exercise of restraint and common sense. Remember that this plan is a necessary adjunct to the Emergency Contingency Plan.

**APPENDIX B**

**SAMPLE LETTER**

**COMMUNICATING EMERGENCY CONTINGENCY PLAN TO LOCAL RESPONSE  
AGENCIES**

Date

Name of Authority

Title

Agency (Fire Dept., Police Dept., etc.)

Address

**SUBJECT: EMERGENCY CONTINGENCY PLAN  
SUN CHEMICAL FACILITY**

**Address**

**City, State & Zip**

Dear Mr./ Mrs./ Ms:

Our facility management has recently updated the facility Emergency Contingency Plan. I would be pleased to make arrangements for you to review this latest revision for familiarization of our facility, types of materials handled and potential hazards posed by these materials. A copy of our Emergency Contingency Plan can be made available if desired.

Please indicate below, how we can best accommodate you for conveying our facility Emergency Contingency Plan, and return the signed form in the enclosed postage paid envelope.

I look forward to receiving your response.

Sincerely,

**SUN CHEMICAL CORPORATION**

Name

Title

GPI Location

- ☐ I would like to arrange a facility visit to review Sun Chemical's Emergency Contingency Plan. I will be contacting your office on \_\_\_\_\_ by telephone to arrange a meeting.
- ☐ I would like to receive a copy of Sun Chemical's Emergency Contingency Plan but a facility visit is **NOT** required at this time.
- ☐ I do not require a facility visit or a copy of Sun Chemical's Emergency Contingency Plan at this time.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Date

**APPENDIX C**

**COPIES OF LETTERS**

**COMMUNICATING EMERGENCY CONTINGENCY PLAN**  
**SENT TO LOCAL RESPONSE AGENCIES**

October 13, 2000

Fire Chief Richard Kamerad  
City of Kankakee Fire Department  
City Hall  
385 East Oak Street  
Kankakee, IL 60901

**SUBJECT:**

**EMERGENCY CONTINGENCY PLAN  
SUN CHEMICAL FACILITY  
3200 Festival Drive  
Kankakee, IL 60901**

Dear Chief Kamerad

Our facility management has recently updated the facility Emergency Contingency Plan. I would be pleased to make arrangements for you to review this latest revision for familiarization of our facility, types of materials handled and potential hazards posed by these materials. A copy of our Emergency Contingency Plan can be made available if desired.

Please indicate on Page 2, how we can best accommodate you for conveying our facility Emergency Contingency Plan, and return the signed form in the enclosed postage paid envelope.

I look forward to receiving your response.

Sincerely,

John J. Kujawa  
Plant Engineer  
Sun Chemical Corporation  
3200 Festival Drive  
Kankakee, IL 60901

**Response from the Kankakee Fire Department**

- ☐ I would like to arrange a facility visit to review Sun Chemical's Emergency Contingency Plan. I will be contacting your office on \_\_\_\_\_ by telephone to arrange a meeting.
- ☐ I would like to receive a copy of Sun Chemical's Emergency Contingency Plan but a facility visit is **NOT** required at this time.
- ☐ I do not require a facility visit nor a copy of Sun Chemical's Emergency Contingency Plan at this time.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Date

October 13, 2000

Corporal Craig Long  
ESDA Coordinator  
Kankakee County Sheriff's Dept.  
470 E. Merchant Street  
Kankakee, IL 60901

**SUBJECT:**

**EMERGENCY CONTINGENCY PLAN  
SUN CHEMICAL FACILITY  
3200 Festival Drive  
Kankakee, IL 60901**

Dear Corporal Long

Our facility management has recently updated the facility Emergency Contingency Plan. I would be pleased to make arrangements for you to review this latest revision for familiarization of our facility, types of materials handled and potential hazards posed by these materials. A copy of our Emergency Contingency Plan can be made available if desired.

Please indicate on Page 2, how we can best accommodate you for conveying our facility Emergency Contingency Plan, and return the signed form in the enclosed postage paid envelope.

I look forward to receiving your response.

Sincerely,

John J. Kujawa  
Plant Engineer  
Sun Chemical Corporation  
3200 Festival Drive  
Kankakee, IL 60901



**Response from the Kankakee County Sheriff's Dept**

- ☐ I would like to arrange a facility visit to review Sun Chemical's Emergency Contingency Plan. I will be contacting your office on \_\_\_\_\_ by telephone to arrange a meeting.
- ☐ I would like to receive a copy of Sun Chemical's Emergency Contingency Plan but a facility visit is **NOT** required at this time.
- ☐ I do not require a facility visit nor a copy of Sun Chemical's Emergency Contingency Plan at this time.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Date

October 13, 2000

Mr. Jeff Brosseau  
Director of Emergency Services  
St. Mary's Hospital  
500 W. Court St.  
Kankakee, IL 60901

**SUBJECT:**  
**EMERGENCY CONTINGENCY PLAN**  
**SUN CHEMICAL FACILITY**  
**3200 Festival Drive**  
**Kankakee, IL 60901**

Dear Mr. Brosseau

Our facility management has recently updated the facility Emergency Contingency Plan. I would be pleased to make arrangements for you to review this latest revision for familiarization of our facility, types of materials handled and potential hazards posed by these materials. A copy of our Emergency Contingency Plan can be made available if desired.

Please indicate on Page 2, how we can best accommodate you for conveying our facility Emergency Contingency Plan, and return the signed form in the enclosed postage paid envelope.

I look forward to receiving your response.

Sincerely,

John J. Kujawa  
Plant Engineer  
Sun Chemical Corporation  
3200 Festival Drive  
Kankakee, IL 60901

**Response from the St. Mary's Hospital**

- ☐ I would like to arrange a facility visit to review Sun Chemical's Emergency Contingency Plan. I will be contacting your office on \_\_\_\_\_ by telephone to arrange a meeting.
- ☐ I would like to receive a copy of Sun Chemical's Emergency Contingency Plan but a facility visit is **NOT** required at this time.
- ☐ I do not require a facility visit nor a copy of Sun Chemical's Emergency Contingency Plan at this time.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Date

Sun Chemical Corporation  
Kankakee, IL.

Response to:  
Notice of Violation  
Compliance Evaluation Inspection

ILD 075 603 886

July 31, 2000

## Contents

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8	Appendix F	Response to Local Emergency Planning Commission (ESDA)

RESPONSE

July 19, 2000

Ms Diane Sharrow  
United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard, DE-9J  
Chicago, Illinois 60604

Ms. Sharrow:

This letter is sent in response to the US EPA letter, dated June 30, 2000 and received July 5, 2000. The US EPA letter followed an on-site inspection conducted on May 22, 2000, and listed "violations" of the IAC, Part 722, Part 725 and Part 728. I will address each of the violations in order.

Also, by this letter, I am requesting an extension of 90 days to complete a total revision of the Emergency Contingency Plan. This revision should be incorporated before the response to citations listed under Section 725.152 (c), (d) and (e) and 725.153.

#### Section 722.123 (a)

##### Statement of violation

For each manifest, the generator must send Part 5 to the Illinois Environmental Protection Agency (IEPA) within two working days. Sun Chemical failed to mail one copy of a hazardous waste manifest to the IEPA, as well as a copy to the State in which the receiving facility was located.

##### Response

Indiana manifest numbered INA 1443430 was inadvertently filed without copies being sent to the generating state, Illinois, and the receiving state, Indiana. The copies were mailed to each state on July 18, 2000. Copies of the cover letters are included in Appendix A.

Also, the regulation was reviewed on July 21, 2000, with the production, maintenance and shipping departments, to minimize the chance of recurrence. Information discussed is included in Appendix B.

Finally, the binder which contains the copies of the manifests, was modified to include two sections instead of one. The first section is used to keep the generator copies until the matching copies are returned from the TSD. The second section is designated to hold the manifests after the TSD copies are attached. Each section has instructions reminding the individuals filing the manifests, that copies must be sent to the generating and receiving states. Copies of the instructions are included in Appendix C.





## Section 722.134 (a) (2)

### Statement of violation

For hazardous waste in containers, the generator must mark and make visible for inspection on each container, the date upon which accumulation began, the words "hazardous waste" and the hazardous waste code(s). Sun Chemical failed to clearly mark four hazardous waste containers with the words hazardous waste, the accumulation date and the appropriate hazardous waste codes.

### Response

The four drums in question were originally marked as required. However, as indicated in the inspection report, the printed dates on the drums had faded due to the elements. The dates were difficult to read.

To prevent recurrence, new, permanent ink marking pens, have been purchased and are being used to label the drums. The effectiveness of the new pens, and their resistance to fading, will be regularly monitored.

In addition, the operator normally assigned to inspect the drums was instructed to scrutinize the drums more closely, assuring that, not only were the drums marked properly, but that the markings were easily seen. He will also re-mark the drums if required.

Finally, whenever a drum is transferred from a "satellite" to the Hazardous Waste Storage Area, the drum is identified and the information is recorded by the Production Manager. Therefore, if the drum information fades, it can be recreated using these records.

## Section 722.134 (c)

### Statement of violation

The facility or installation must limit satellite accumulation to 55 gallons (110 kilograms) and mark the containers with the words, "Hazardous Waste". When the 55-gallon limit is met, the facility or installation must mark the container with an accumulation start date and move the container to a hazardous waste storage area within three days of the accumulation start date. Sun Chemical does not have interim status or a permit. Sun Chemical failed to label and move one 55-gallon drum to the hazardous waste storage area.

### Response

The 55-gallon accumulation drum was found to be nearly full, as indicated in the violation. The second drum brought to the area in anticipation should not have been marked as "hazardous waste" until the first drum was totally filled, dated and removed.

To minimize the possibility of recurrence, the procedure to be utilized in satellite stations has been re-posted. See Appendix D.

## Section 722.142 (a) (1)

### Statement of violation

The facility or installation must contact the receiving facility within 35 days of the date of delivery of hazardous waste to a transporter if the generator had not received a copy of the manifest from the receiving facility. The facility or



installation failed to contact the receiving facility on two manifests for which copies from the receiving copies were missing.

## Response

The two manifests in question were INA 1443430 and MI 7925051.

Manifest INA 1443430 was initiated on April 27, 2000. The US EPA inspection was conducted on May 22, 2000. April 27<sup>th</sup> to May 22<sup>nd</sup> is a total of 25 days. We were not required to notify the TSD until after 35 days, June 1<sup>st</sup>, if we had not received their signed copy. I contacted the TSD and found that the TSD was mailed on time but to the wrong address. The address on the manifest was for 1300 Festival Drive, not 3200 Festival Drive. The address issue has been corrected. We had a copy faxed to us to complete the file.

Manifest MI 7925051 was incomplete at the time of the US EPA inspection. The signed copy from the TSD was on site but not attached to the generator copy.

As stated earlier, instructions were added to the manifest binder. The 35 day limit was stated. This should prevent the oversight which occurred with regard to manifest MI 7925051.

## Section 725.133

### Statement of violation

The facility or installation must test and maintain communication and alarm systems, fire protection equipment, spill control equipment, and decontamination equipment. Sun Chemical did not have records that the above listed systems and equipment were tested and maintained.

### Response

The characteristic of the plant waste, which renders it as "hazardous", is ignitability. Therefore, fire fighting equipment, communications equipment, alarms and spill control equipment must be maintained on a regular basis.

Records which verify that the fire fighting equipment and alarms have been maintained are listed below.

- Internal, monthly in-plant inspections of fire fighting equipment, fire doors, etc.
- Monthly fire extinguisher inspections by an outside contractor (Liberty Fire Equipment)
- Monthly inspections and testing of the alarm system by an outside contractor (ADT). The fire pump is tested as part of this procedure.
- Annual inspection and testing of the fire pump, deluge valves and fire sprinkler system by an outside contractor (Cannon Fire Protection Company)

The local fire department chose to decline the opportunity to witness the fire pump test.

- Annual inspection of the fire protection equipment by an agent of the insurance company. The agent also witnesses the annual pump and deluge valve test.  
(Royal Sun Alliance)

Samples of the above reports are contained in Appendix E

Communications within the plant are conducted through the use of the plant-wide phone system. These include internal and external phone service as well as the plant-wide paging system. Since these are used continuously throughout the day, there are no regular, preventative maintenance tests performed. If there is a disruption in the phone service or paging systems, the problem is resolved as quickly as possible.

Spill control for tanks is provided by containment dikes or trenches. Any overflow, which could occur from a tank, would be contained within a dike or a trench system. From the containment, the material would be pumped to available totes. The air operated diaphragm pumps are rebuilt with a minimum of two available at all times. If the leak was to occur from a tanker, drum or tote on the outside, it would be controlled by absorbent booms, bagged absorption material, a PIG Spill and Salvage Kit (in a 95 gallon drum), aluminum shovels and beryllium rakes. The aluminum shovels and beryllium rakes are under lock and key, with each supervisor having access to them. There is no access to the municipal sewer system except from the maintenance shop and domestic/wash room wastes.

## Section 725.137

### Statement of violation

Arrangements with local emergency authorities must be made to familiarize them with the layout of the facility or installation, the properties of hazardous waste managed, places where personnel are working, entrances and evacuation routes. Sun Chemical did not have records that preparedness and prevention arrangements had been attempted with the local emergency authorities.

### Response

On January 14, 2000, a meeting was held with the local emergency planning commission, which, in our situation, is the Kankakee County Emergency Services and Disaster Agency (ESDA). The Chairman of the L.E.P.C., Bill Chigaros, reviewed our plant layouts, including all information shown on the layouts. He asked that certain information be added to the layout and that the layout be resubmitted, both electronically and as a set of prints. This was completed.

Mr. Chigaros indicated that he was familiar with the Sun Chemical facility and that a site tour was unnecessary at the time. He also invited me to join the ESDA meeting as an Industrial member. I attended the following meeting in that capacity.

I have included a copy of the response letter to Mr. Chigaros in Appendix F.



## Section 725.152 (c), (d) and (e)

### Statement of violation

The contingency plan must describe arrangements with the police and fire departments, hospitals, contractors and emergency response teams, contain the emergency coordinator's home address, and identify and describe the capability of all emergency equipment. Sun Chemical did not describe the arrangements with local authorities, contain the emergency coordinator's home address, nor identify the capability of all emergency equipment.

### Response

The Contingency Plan is being revised at this time. Since the process has only recently started, we are seeking an extension of 90 days to complete the revision. The 90-day extension is required to review arrangements with the local fire department, sheriff's department, hospital, contractors, and emergency response teams.

## Section 725.153

### Statement of violation

The contingency plan must be submitted to the police department, fire department, hospital and emergency response teams. Sun Chemical did not have records that the contingency plan had been submitted to the local emergency authorities.

### Response

The regulation again refers to the Emergency Contingency Plan. Therefore, as in the previous paragraph, we are requesting a 90-day extension to complete the revision of the emergency Contingency Plan and make the provision to the fire and sheriff's departments, hospital, contractors and emergency response teams.

## Section 725.116 (a) through (d)

### Statement of violation

The facility or installation must have a personnel training program that covers, at a minimum, 1) the procedures to familiarize personnel with emergency procedures, emergency equipment and emergency systems; 2) the procedures for using, inspection, repairing and replacing emergency and monitoring equipment; 3) communications and alarm systems; 4) response to fires and explosions; 5) response to groundwater contamination incidents; and 6) shutdown of operations. The facility or installation must also train all new employees within six months of the date of employment, and conduct an annual review of the initial training. Documents and records must be kept by the facility or installation, including job titles, job descriptions, description of hazardous waste training, and records that document the training given to facility or installation personnel. The facility or installation must keep these training records until closure of the facility or installation or for at least three years for former employees. Sun Chemical did not have records that demonstrated that the training program was in place, that new employees had been trained within six months of employment, that

employees had receive an annual review, and that all required records were being maintained.

Response

The two individuals who did not have documented hazardous waste training in their personnel records received training on July 27, 2000.

Section 728.107

Statement of violation

Copies of land disposal certifications must be kept at the facility or installation. Sun Chemical was missing certified/signed copies of land disposal restrictions for fifteen shipments of hazardous waste in the last three years.

Response

A review of Section 728.107(a)(1)...last sentence and 728.107(a)(2) indicate that a one-time, written notice must be sent with the initial shipment of a waste stream to each storage or treatment facility utilized by a generator. Section 728.107(a)(2) also states that "No further notification is necessary until such time that the waste or facility changes, in which case a new notification must be sent and a copy placed in the generator's file."

If there is a requirement for a signed copy of the Land Disposal Restriction (LDR) to accompany every shipment, or an un-signed copy of the Land Disposal Restriction to accompany every shipment, I will revise the procedure. Please clarify.

To be sure that we have on file, a copy of the LDR, for each of the waste streams, at each of the Treatment, Storage, Disposal (TSD) facilities, I have requested copies from each TSD that we have shipped hazardous waste to within the last three years. A section of the Hazardous Waste Manifest Binder has been set up to contain our copies of the Land Disposal Restriction Forms.

Finally, until the requirement for signed/un-signed copies of the LDR is clarified, I have instructed those shipping out hazardous waste to be sure to sign an LDR and obtain a copy for our records.

If there is any additional information required, please call. My phone number is (815) 939-0136.

Sincerely,



John J. Kujawa  
Plant Engineer  
Sun Chemical  
3200 Festival Drive  
Kankakee, IL 60901

cc: R. Klecan  
J. McBurrows  
C. Raycroft





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

*Received July 5, 2000* *JK*

REPLY TO THE ATTENTION OF

DE-9J

JUN 30 1990

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. John J. Kujawa  
Plant Engineer  
Sun Chemical Company  
3200 Festival Drive  
Kankakee, Illinois 60901

Re: Notice of Violation  
Compliance Evaluation Inspection  
EPA I.D. No.: ILD 075 603 886

Dear Mr. Kujawa:

On May 22, 2000, representatives of the United States Environmental Protection Agency (U.S. EPA) inspected Sun Chemical Company located in Kankakee, Illinois (Sun Chemical). The purpose of the inspection was to evaluate Sun Chemical's compliance with the Standards Applicable to Generators of Hazardous Waste, the Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities, and the Land Disposal Restrictions set forth at 35 Illinois Administrative Code (Title 35: IAC Environmental Protection, Subtitle G: Land Pollution, Chapter I: Pollution Control Board). Enclosed please find a copy of our inspection report.

Based on the May 22, 2000, inspection, we have determined that Sun Chemical Company is violating the following regulations.

~ IAC Part 722: Standards Applicable to Generators of Hazardous Waste:

Section 722.123(a) - For each manifest, the generator must send Part 5 to the Illinois Environmental Protection Agency (IEPA) within two working days. Sun Chemical failed to mail one copy of a hazardous waste manifest to the IEPA, as well as a copy to the State in which the receiving facility was located.

a hazardous waste manifest to the IEPA, as well as a copy to the State in which the receiving facility was located.

Section 722.134(a)(2) - For hazardous waste in containers, the generator must mark and make visible for inspection on each container, the date upon which accumulation began, the words "hazardous waste" and the hazardous waste code(s). Sun Chemical failed to clearly mark four hazardous waste containers with the words hazardous waste, the accumulation date and the appropriate hazardous waste codes.

Section 722.134 © - The facility or installation must limit satellite accumulation to 55 gallons (110 kilograms) and mark the containers with the words, " Hazardous Waste". When the 55 gallon limit is met, the facility or installation must mark the container with an accumulation start date and move the container to a hazardous waste storage area within three days of the accumulation start date. Sun Chemical does not have interim status or a permit. Sun Chemical failed to label and move one 55 gallon drum to the hazardous waste storage area.

Section 722.142(a)(1) - the facility or installation must contact the receiving facility within 35 days of the date of delivery of hazardous waste to a transporter if the generator had not received a copy of the manifest from the receiving facility. The facility or installation failed to contact the receiving facility on two manifests for which copies from the receiving copies were missing.

IAC Part 725: Interim Status Standards for Owners and Operators of Treatment, Storage and Disposal Facilities:

Section 725.133 - The facility or installation must test and maintain communication and alarm systems, fire protection equipment, spill control equipment, and decontamination equipment. Sun Chemical did not have records that the above listed systems and equipment were tested and maintained.

Section 725.137 - Arrangements with local emergency authorities must be made to familiarize them with the layout of the facility or installation, the properties of hazardous waste managed, places where personnel are working, entrances and evacuation routes. Sun Chemical did not have records that preparedness and prevention arrangements had been attempted with the local emergency authorities.

Section 725.152(c), (d) and (e) - The contingency plan must describe arrangements with the police and fire departments,



hospitals, contractors and emergency response teams, contain the emergency coordinator's home address, and identify and describe the capability of all emergency equipment. Sun Chemical did not describe the arrangements with local authorities, contain the emergency coordinator's home address, nor identify the capability of all emergency equipment.

Section 725.153 - The contingency plan must be submitted to the police department, fire department, hospital and emergency response teams. Sun Chemical did not have records that the contingency plan had been submitted to the local emergency authorities.

Section 725.116(a) through (d) - The facility or installation must have a personnel training program that covers, at a minimum, 1) the procedures to familiarize personnel with emergency procedures, emergency equipment and emergency systems; 2) the procedures for using, inspecting, repairing and replacing emergency and monitoring equipment; 3) communications and alarm systems; 4) response to fires and explosions; 5) response to groundwater contamination incidents; and 6) shutdown of operations. The facility or installation must also train all new employees within six months of the date of employment, and conduct an annual review of the initial training. Documents and records must be kept by the facility or installation including job titles, job descriptions, description of hazardous waste training, and records that document the training given to facility or installation personnel. The facility or installation must keep these training records until closure of the facility or installation or for at least three years for former employees. Sun Chemical did not have records that demonstrated that the training program was in place, that new employees had been trained within six months of employment, that employees had received an annual review, and that all required records were being maintained.

#### IAC Part 728: Land Disposal Restrictions:

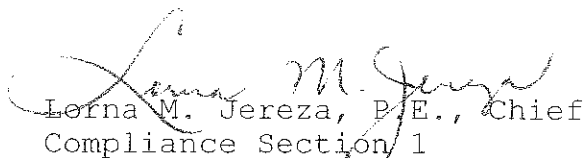
Section 728.107 - Copies of land disposal certifications must be kept at the facility or installation. Sun Chemical was missing certified/signed copies of land disposal restrictions for fifteen shipments of hazardous waste in the last three years.

According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period.

Although this letter is not such an order, we request that you submit a written response to the violations cited above within 30 days of receipt of this letter. The response should document the actions, if any, which you have taken since the inspection to comply with the above requirements. You should submit your response to Diane Sharrow, United States Environmental Protection Agency, Region 5; 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604.

If you have any questions regarding this matter feel free to contact Diane Sharrow, of my staff, at (312) 886-6199.

Sincerely,



Lorna M. Jereza, P.E., Chief  
Compliance Section 1

Enforcement and Compliance Assurance Branch  
Waste, Pesticides and Toxics Division

Enclosure

cc: Cliff Gould, IEPA  
Todd Marvel, IEPA



United States  
Environmental Protection  
Agency  
Region 5  
77 West Jackson Blvd.

Chicago, IL 60604

SHARROW (DE-9T)

Official Business  
Penalty for Private Use  
\$300

Fold at line over top of envelope to  
the right of the return address

**CERTIFIED**

P 140 896 513

**MAIL**

John Kujawa, Plant Engineer  
Sun Chemical  
3200 Festival Drive  
Kankakee, Illinois 60901



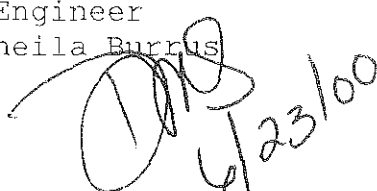
Printed on Recycled Paper



U.S. EPA - Region 5  
Waste, Pesticides and Toxics Division  
Enforcement and Compliance Assurance Branch

CEI INSPECTION REPORT

FACILITY NAME: Sun Chemical Company/Sun Chemical Ink  
USEPA ID NO: ILD 075 603 886  
FACILITY ADDRESS: 3200 Festival Drive  
Kankakee, Illinois 60901  
FACILITY TYPE: Large Quantity Generator  
FACILITY REPRESENTATIVE: John Kujawa, Plant Engineer  
USEPA INSPECTOR: Diane Sharrow and Sheila Burrus  
STATE INSPECTOR: None  
DATE OF INSPECTION: May 22, 2000  
NAIC CODE: 0000  
INSPECTION PRIORITY,  
SECTOR AND/OR PROCESS: TSD  
PBTs: None



INTRODUCTION:

Prior to the completion of a Compliance Evaluation Inspection (CEI) at this Facility, all files in the RCRA File Room were reviewed. From review of the files and the RCRIS database it was determined that Sun Chemical Corporation had notified the U.S. EPA of its hazardous waste activities on or about August 12, 1980. Sun Chemical Corporation had originally notified as a TSD with container storage greater than 90 days. A Part A permit application was submitted on or about November 19, 1980, for two hazardous waste storage areas. This Part A was later withdrawn and the two greater than 90 days storage areas were closed. No process or sector manuals were reviewed prior to the CEI. There are no known hazardous waste permits or orders in existence for this facility.

FACILITY BACKGROUND:

Sun Chemical Corporation manufactures commercial printing inks at this Facility. The primary waste streams are waste inks and solvents, including RCRA hazardous waste codes D001, D007, F003, F005. The Facility has operated at the Kankakee location since approximately 1974. Hazardous waste is stored in 55-gallon drums at the rear of the Facility in an outdoor less than 90 day hazardous waste storage area. See the attached Facility Location and Facility Layout from the Preliminary Assessment / Visual Site

Inspection (PA/VSI).

COMPLIANCE EVALUATION INSPECTION:

We arrived at the Facility at approximately 10:00 am CST. We introduced ourselves to the Receptionist and presented our Enforcement / Inspection Credentials. We were referred to John Kujawa, the Plant Engineer. We then re-presented our credentials to Mr. Kujawa. Diane Sharrow then made a brief introduction as to the purpose of the inspection, and in compliance with the *Small Business and Regulatory Fairness Act, (SBREFA)*, provided Mr. Kujawa with a copy of the U.S. EPA Information Sheet entitled, *Information for Small Businesses*.

We then went to the hazardous waste storage area. Seven 55-gallon drums of hazardous waste were in the outdoor storage area. All of the drums were labeled as hazardous waste and dated. However, dates on four of the drums were barely legible due to exposure to the elements. The pavement in the storage area was cracked in several areas. We then proceeded inside the plant. We stopped inside the laboratory. No hazardous waste generation or accumulation was conducted in this area. We then entered the production area where two 55 gallon drums were being used for satellite accumulation in the "Base Pigments Production Area". One drum was full and had not been dated with the start of accumulation. No photographs were taken.

A record review was then initiated. A review of the manifests indicated that several manifests were not properly mailed, or did not have signed copies. Several manifests were also missing Land Disposal Restriction (LDR) Forms or signatures on the LDRs.

MANIFEST NO. - VIOLATION SUMMARY

INA 1443430 - Generator copy not mailed to IL. Out-of-state copy not mailed to IN. No TSD signature.  
MN 7925051 - No TSD signature. LDR not signed.  
IL 8506894 - No generator copy. No LDR.  
MI 7870937 - LDR not signed.  
IL 7451139 - No generator copy. No LDR.  
IL 8506848 - No generator copy. No LDR.  
MI 7870570 - LDR not signed.  
MI 7870837 - No LDR.  
MI 7870634 - No LDR.  
MI 7325043 - No generator copy. LDR not signed.  
MI 7228175 - LDR not signed.  
MI 7228009 - LDR not signed.  
MI 7231245 - LDR not signed.

MI 7231132 - LDR not signed.  
MI 7322392 - LDR not signed.  
IL 8142640 - LDR not signed.

Further review of records for preparedness and prevention indicated that Sun Chemical Company did not have evidence of testing and maintenance of the communication/alarm systems, fire protection equipment, spill control equipment and decontamination equipment. As well, there was no written evidence of planned arrangements with local agencies, the contingency plan did not discuss the capability of emergency equipment, the contingency plan did not contain the emergency coordinator's home address, and there was no evidence that the contingency plan had been submitted to the local hospital, police and fire departments. Review of the personnel training records indicated that Sun Chemical did not have records of a training program that met the requirements of 35 Illinois Administrative Code (Title 35: Environmental Protection, Subtitle G: Land Pollution, Chapter I: Pollution Control Board), or the "regulations".

#### FINDINGS:

Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, the Administrator of U.S. EPA may authorize a state to administer the RCRA hazardous waste program in lieu of the federal program when the Administrator finds that the state program meets certain conditions. Any violation of regulations promulgated pursuant to Subtitle C (Sections 3001-3023 of RCRA, 42 U.S.C. §§ 6921-6939e) or of any state provision authorized pursuant to Section 3006 of RCRA, constitutes a violation of RCRA, subject to the assessment of civil penalties and issuance of compliance orders as provided in Section 3008 of RCRA, 42 U.S.C. § 6928.

Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), the Administrator of U.S. EPA granted the State of Illinois final authorization to administer a state hazardous waste program in lieu of the federal government's base RCRA program effective January 31, 1986. 51 Fed. Reg. 3778 (January 31, 1986). The Administrator of U.S. EPA granted Illinois final authorization to administer certain HSWA and additional RCRA requirements effective March 5, 1988, 53 Fed. Reg. 126 (January 5, 1988); April 30, 1990, 55 Fed. Reg. 7320 (March 1, 1990); June 3, 1991, 56 Fed. Reg. 13595 (April 3, 1991); August 15, 1994, 59 Fed. Reg. 30525 (June 14, 1994); May 14, 1996, 61 Fed. Reg. 10684 (March 15, 1996); and October 4, 1996, 61 Fed. Reg. 40520 (August 5, 1996). The U.S. EPA-authorized Illinois regulations are codified at 35 Illinois

Administrative Code (IAC) Part 703 et seq. See also 40 C.F.R.



§ 272.700 et seq..

Sun Chemical Company has violated the following regulations:

Part 722: Standards Applicable to Generators of Hazardous Waste:

Section 722.123(a), Section 722.134(a)(2), Section 722.134(c),  
Section 722.142

Part 725: Interim Status Standards for Owners and Operators of  
Treatment, Storage and Disposal Facilities:

Section 725.133, Section 725.137, Section 725.152(c), (d) and (e),  
Section 725.153, Section 725.116(a) through (d)

Part 728: Land Disposal Restrictions

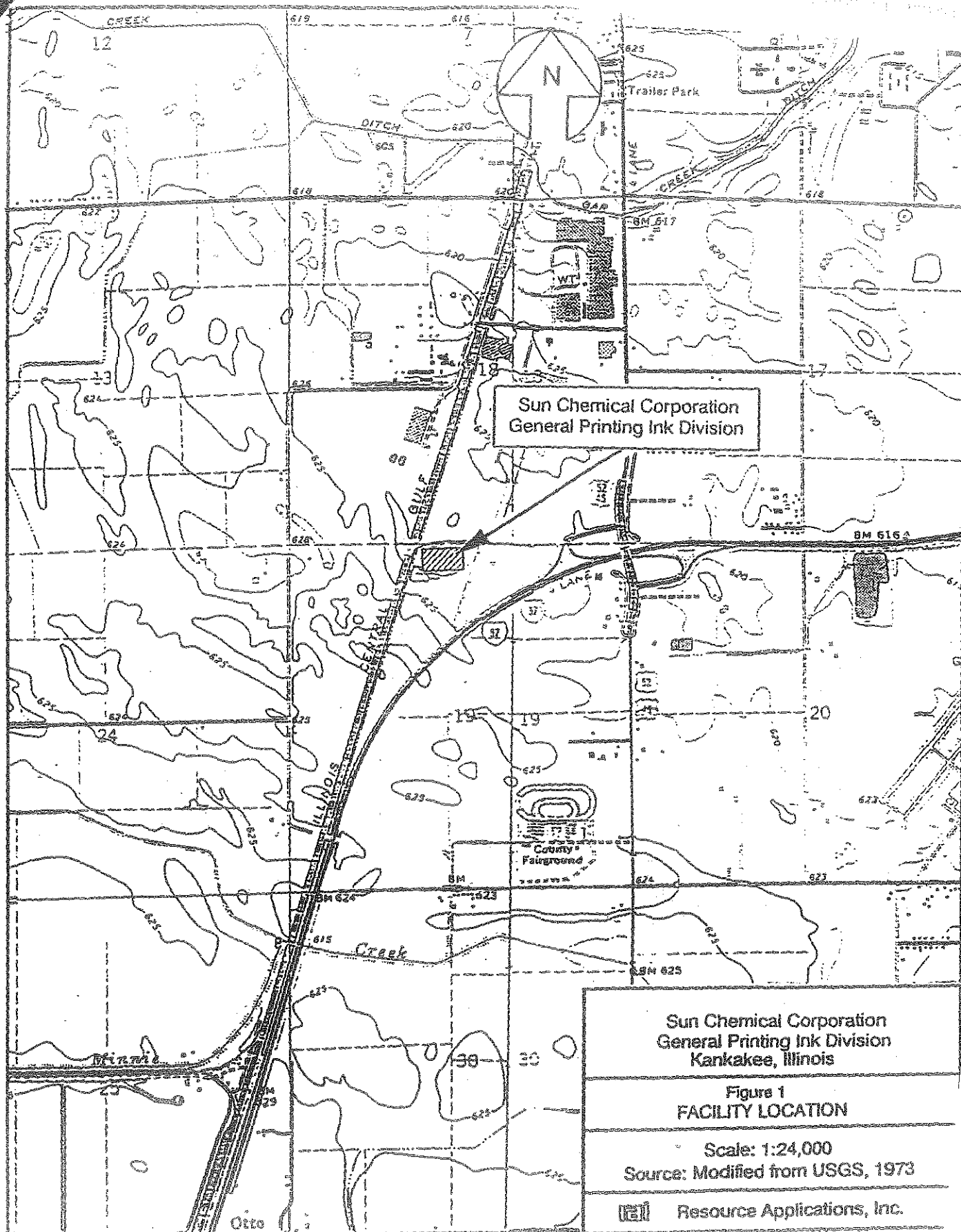
Section 728.107

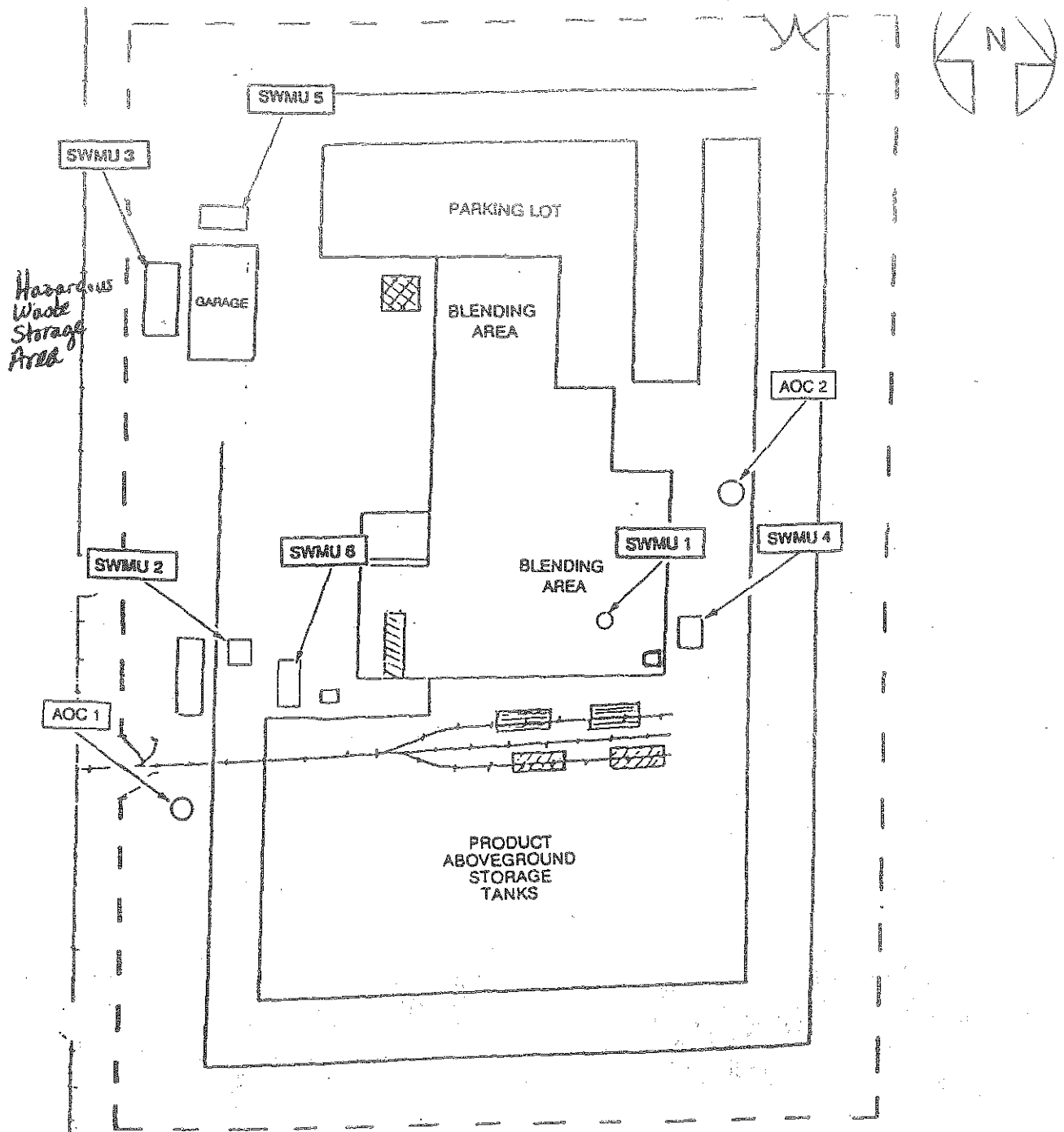
FOLLOW-UP:

A Notice of Violation will be issued to Sun Chemical Company.

Attachments:

Facility Location  
Facility Layout





**Solid Waste Management Unit (SWMU)**

1. Hazardous Waste Satellite Accumulation Area
2. Nonhazardous Waste Storage Area
3. Hazardous Waste Storage Area
4. Wastewater Storage Tank
5. Former North Hazardous Waste Storage Area
6. Former South Hazardous Waste Storage Area

**Areas of Concern (AOC)**

1. Area of the Diesel Fuel Underground Storage Tank
2. Area of the Oil Underground Storage Tank

Sun Chemical Corporation  
General Printing Ink Division  
Kankakee, Illinois

Figure 2  
FACILITY LAYOUT/SWMU AND AOC LOCATIONS

Scale: 1" = 85'

Source: Modified from SUN sketch  
received by RAI on May 22, 1992



Resource Applications, Inc.



## DOCUMENT 1 OF 2

John J. Kujawa  
Plant Engineer  
Sun Chemical  
3200 Festival Drive  
Kankakee, IL 60901

## DOCUMENT 2 OF 2

John J. Kujawa  
Plant Engineer  
Sun Chemical  
3200 Festival Drive  
Kankakee, IL 60901





## APPENDIX B

July 20, 2000

To: Carl Donaldson  
Eric Johnson  
Ron Klecan  
From: John Kujawa  
Subj: Hazardous waste manifests

When disposing of hazardous wastes, it is imperative that all copies of the manifests are handled correctly. During the last EPA inspection, on May 22, 2000, we were cited for violations on 16 different manifests. These occurred over the last 3 years. The violations were based on the mis-filing of manifests, lack of required LDR signatures, lack of LDR forms, lack of follow-up on one manifest, etc.

In order to make the distribution of manifest copies easier to handle, I have included the instructions for distribution for the following states, Michigan, Illinois, Indiana and Wisconsin.

### Michigan (Information should also be listed on the back of the manifest)

Generator "Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Send the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan, when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received."

Also, the Land Disposal Restriction form (LDR) must be filled in and signed. This form should also be provided by the transporter.

### Illinois (Information should also be listed on the back of the manifest)

Generator "Retain copy 6. Mail copy 5 to the IEPA within 2 days of the shipment if waste is RCRA hazardous or PCB waste."

Also, the Land Disposal Restriction form (LDR) must be filled in and signed. This form should also be provided by the transporter.

### Indiana (Information should also be listed on the back of the manifest)

Generator in-state "Retain Copy 8 and detach and mail Copy 2 to Indiana DEM

Generator out-of-state "Retain Copy 8 and mail Copy 2 to the Generator State (if applicable) and mail Copy 3 to Indiana OEM

## APPENDIX B

Also, the Land Disposal Restriction form (LDR) must be filled in and signed.  
This form should also be provided by the transporter.

**Wisconsin** (Information should also be listed on the front of the form, or complete instructions should be listed on the back of Copy 6)

Copy Distribution      1. Generator to send to Wisconsin DNR  
                                 2. Generator retain

Also, the Land Disposal Restriction form (LDR) must be filled in and signed.  
This form should also be provided by the transporter.

In each case, the Generator, Sun Chemical, will retain a copy of the manifest and the signed LDR form, for our own file, plus copies to be mailed to the State of Illinois as well as the state where the waste is taken to. Those copies should be delivered to the Engineering Office or left in the Engineering mail slot. I will be sure that copies are mailed to the state agencies and that our copies are filed. Copies to be mailed out will be handled by Helen Warchol or Kathy Dell.

When the waste is finally delivered to the Treatment, Storage and Disposal Site (TSD), the TSD will sign off and send back a copy of the manifest. This should take place within a week or two. If the TSD copy is not returned within 35 days, we must call the TSD for a copy. If 45 days go by, and we still have not received our TSD copy, we should contact the IEPA. An Exemption Report will have to be filed. If the TSD copy is returned, it will be stapled to the generator copy and the LDR copy. Then both will be kept in the Engineering Office, in a binder.

One other concern, be sure that all information is typed or written with enough pressure so that the information is legible on the bottom copy.

NOTE The issue of whether or not a signed copy of the Land Disposal Restriction (LDR) is required for each shipment of a hazardous waste, is still under review by the US EPA. However, it does appear that a signed copy of an LDR must accompany the initial shipment of each waste to a particular TSD. Since a file with our copies of signed, original LDR's could not be found, we will, for the foreseeable future, sign an LDR and make a copy for our records.

Any questions? Please call. Thanks.



**APPENDIX C**  
DOCUMENT 1 OF 2

**Hazardous and Non Hazardous Manifests**

**Unpaired Forms**

After a shipment of hazardous wastes, the supervisor responsible for the shipment, or the Plant Engineer, must be sure that copies of the manifest are sent to the proper authorities.

- One of the copies must be sent to the generating state, in our case, Illinois.
- If the final destination of the waste is in a state other than Illinois, another copy must be sent to the state where the hazardous waste "Treatment, Storage and Disposal" (TSD) facility is located, in our case, Wisconsin, Michigan or Indiana.
- Finally, one copy, marked "generator" must be kept in this section of the binder.

After a shipment reaches its final destination, the TSD must return a copy of the completed manifest to us. When we receive the copy, it must be stapled to the "generator" copy in this section, then transferred to the following section of the binder, which is tabbed "complete".

**Note:** If the TSD does not return a copy within 35 days, call the TSD and have it faxed. If the TSD copy is not received within 45 days, notify the State of Illinois and send a copy of the manifest to them at the address on the top of the manifest.

**Example:** When Millennium picks up a hazardous waste, it uses a manifest from Indiana. Copy 2 of the manifest would be sent to the generating state, which would be Illinois. Copy 3 would be sent to the receiving state, which would be Indiana. Copy 8 would be filed in this section of the binder. When Copy 4 is received from the Treatment, Storage, Disposal (TSD) facility, it should be stapled to Copy 8 and then Copies 4 and 8 should be shifted to the next section of this binder.

According to the US EPA, we should have a SIGNED copy of the Land Disposal Restriction (LDR) included in our file for each shipment of hazardous waste. This requirement is being questioned as of 7/17/00. However, until further notice, include a SIGNED copy along with the manifest copy.

7/17/00

## **APPENDIX C**

DOCUMENT 2 OF 2

### **Hazardous and Non Hazardous Manifests**

#### **Paired Forms**

**When a copy of a manifest is received from the TSD, it should be attached to the original “generator” copy, and the two should be placed in the “Paired Forms” section. The packet should also include the LDR and any other manifest related material.**

**7/17/00**



## APPENDIX D

### Satellite Stations

#### Operating Procedures

According to the Illinois Administrative Code the plant is allowed to accumulate hazardous waste material at "satellite stations" where the waste is generated provided that certain conditions are maintained. Those conditions are as follows:

- No more than 55 gallons can be accumulated at a satellite site
- The site must be under direct control of an operator
- Before a new drum of waste is started, the drum must be labeled with a Hazardous Waste sign and stating, **in permanent ink**, the type of waste in the drum.
- Once the drum is filled, it must be marked with an "accumulation start date", with a **permanent pen** and relocated outside in the Hazardous Waste storage area, behind the truck wash station. When placed in the Hazardous Waste storage area, all drums should be positioned such that the labels face toward the aisle. It must be easy to read the labels.
- **The drum of hazardous waste must be shipped within 90 days from the date marked on the drum.** The employee charged with monitoring the hazardous waste drums will notify the maintenance supervisor or the plant engineer when the drums have been outside for 60 days. The employee will also notify their supervisor or plant engineer if the dates are starting to fade. The labels must be kept in a legible state. The maintenance supervisor or the plant engineer will call the hazardous waste treatment facility to have the drums picked up. **As stated earlier, the drums must be off-site in 90 days at the latest.**
- **Under no conditions should there be more than one labeled drum at a satellite site.**
- The Production Manager must be notified whenever a drum of Hazardous Waste is transferred to the outside storage area. He will maintain the records of the transfers.







## FILE FOR EXAMINATION OF F. I. A. INSPECTOR

## APPENDIX E (a)

Plant SUN CHEMICAL CORPORATIONLocation KANKAKEE, ILLINOISDate 5-31-2000

A.D.T. 932-6741

FIRE 933-3311

NOTIFIED

BEFORE TEST

AFTER TEST

## PLANT FIRE PREVENTION INSPECTION

(To be made at least once a week)

List ALL Inside and Outside FIRE PROTECTION VALVES

Notify the Insurance Department if ANY valve is left closed

Valve Number	CONTROLS	Open	Sealed	Shut	Water Pressure	Pressure With Drain Valve Open	Valve Number	CONTROLS	Open	Sealed	Shut	Water Pressure	Pressure With Drain Valve Open
1	ok	X					17-18	WHS. NORTH FOAM			X	ok	
2	ok	X					19-20	WHS. CENTER FOAM			X	ok	
3	ok	X					21-22	WHS. SOUTH FOAM			X	ok	
4	ok	X					23	TRUCK LOAD MAIN	X			ok	
5	ok	X					24	TRUCK LOAD DRAIN			X	ok	
6	ok	X					25-26	PROD. TEST			X	ok	
7	ok	X					27-28	PROD. WEST FOAM			X	ok	
8	ok			X			29-30	PROD. EAST FOAM			X	ok	
9	ok			X			31-32	BAG ROOM FOAM			X	ok	
10	ok	X					33	CRITTER RM TEST			X	ok	
11	ok			X			34	HOSE TREE			X	ok	
12	ok	X					35		X			ok	
13	ok			X			36	SO. OUTSIDE RISER	X			ok	
14	ok			X								ok	
15-16	WHS. -TEST & DRAIN			X								ok	

If any valve found shut or unsealed, give explanation on reverse of sheet; replace missing seals and record pressure with drain valve wide open after resealing; if any sprinkler alarms inoperative, comment on corrective action being taken.

Are Dry Pipe Valves on Air? \_\_\_\_\_ Did you test for water column? \_\_\_\_\_ Check low points for condensate? \_\_\_\_\_

## SPRINKLERS AND PIPING

Defects	Location	What action is being taken?
Stock within 36" of sprinklers	Good	
Sprinklers or piping bent	Good	
Sprinklers painted	Good	
Sprinklers or piping corroded	Good	
Sprinklers loaded with dirt	Good	
Sprinklers obstructed by new partitions	Good	
New platform, etc. requiring sprinklers	Good	

Was water drained from all low points on dry pipe systems?

CITY WATER PRESSURE AT PUMP 70 P.S.I.

COMING ON PRESSURE OF PUMP - P.S.I.

## FIRE PUMPS

Fire Pump should be tested at least once a week developing full water pressure.

NAME OF PUMP	TYPE OF PUMP DRIVE Steam, Electric, Gas Engine	Good Supply Lubricants?	Tested Today?	Water Pressure with Pump Running	Condition of Pump
AURORA	100 H.P. ELECTRIC	ok	-	150 lbs.	Good
AURORA	2 H.P. ELECTRIC	ok	-	lbs.	Good
				lbs.	
				lbs.	

Was pump reservoir found full? N/A If not, did you have it filled? N/A Is pump suction clean? N/A

Is pump priming tank full? N/A If steam pump, is trap O.K.? N/A Are drips open? N/A Is sufficient steam pressure maintained at all times to operate pump? N/A If electric pump, are contact points on all switches, circuit-breakers, controllers, etc., in good condition? yes

If engine driven pump, is fuel supply adequate? N/A Number Gals. on hand? N/A Is battery charger in operating condition? N/A

Is water in battery at proper level? N/A Battery hydrometer reading? N/A If reading was low, was battery promptly replaced or re-charged? N/A Any delay in picking up suction? N/A

## CITY WATER

Is Water in commission? yes Pressure on gage. 20 lbs.

## SPRINKLER TANK-STANDPIPE-ELEVATED RESERVOIR

Did you PERSONALLY EXAMINE? N/A Found full? N/A If not, did you have it filled? N/A

Is by-pass for filling kept shut? N/A Is tell-tale in working order? N/A Is tank heater in working order? N/A

Temperature of water? N/A °F. If pressure tank, give gage reading N/A lbs. Is water in pressure tank at 2/3rds level? N/A

### HOSE HOUSES

Did you personally inspect each hose house? yes Were any obstructed? no Do hydrants drain properly? yes

Hose House No.	No. Ft. Hose	No. Noz-zles	No. Axes	No. Bars	No. Lan-terns	No. Span-ners	No. Wrench-es	Arr'gd. O.K.	Hose House No.	No. Ft. Hose	No. Noz-zles	No. Axes	No. Bars	No. Lan-terns	No. Span-ners	No. Wrench-es	Arr'gd. O.K.
1	250	1	1	1	1	4	2	ok	5								
2	250	1	1	1	1	4	2	ok	6								
3									7								
4									8								

### FIRE DOORS

Did you personally close all doors and shutters and are they in good working order? yes Is tinwork in good condition? yes Are automatic closing devices in good order? yes Comment on all defective doors, shutters, and automatic closing devices and nature of defect.

### STANDPIPES AND HOSE

Was hose attached to each outlet? yes Nozzle attached? yes Properly racked? yes Condition? good

### EXTINGUISHERS AND FIRE PAILS

Did you examine each unit? yes Did you arrange for all necessary refills? yes Are any exposed to freezing? no Is each drum provided with three fire pails? yes Were all units accessible? yes Condition? good

### CARE AND CLEANLINESS

List locations where housekeeping was not satisfactory all

Will these be cleaned up? yes

### FIRE DRILLS

Date held? NONE Was drill expected? yes Water on 1 minutes 0 seconds after alarm. Number of men in drill? 1 Was signal clear to all men? yes

### WATCHMEN

Did you check all watchmen's records? yes A. D. T. yes Were rounds made on time? yes If any stations or rounds were missed, give reasons.

### WIRING AND ELECTRICAL EQUIPMENT

Are all panel boards, switch and fuse cabinets clean? yes Are all outlet box covers in place? yes Are all cabinet doors latched shut? yes Are motors clean, externally and internally? yes Are they properly lubricated? yes Is there any overfusing of circuits? no Is there any temporary wiring? yes If so, comment on locations Blue Control Room

### HEATING

Are all steam pipes and coils 1-inch clear of woodwork and supported safely? ok Are all stove, stovepipes and chimneys in safe condition? ok

### VOLATILE AND COMBUSTIBLE MATERIALS

Were these materials needed where found? yes Were they safely stored and handled? yes Were quantities limited to one day's supply inside building in each case? yes Are safety cans used and in good condition? good

### SMOKING

List locations where permitted DESIGNATED AREAS ONLY.

Is housekeeping satisfactory in permitted areas? yes

Do employees fully understand smoking rules? yes Did you find any evidence of smoking in restricted areas? no

### GENERAL COMMENTS AND RECOMMENDATIONS

List here all necessary repairs or replacements, any unusual conditions and any suggestions for additional fire protection, or improvement of any fire hazard

Inspected by Larry K. Swartz Date 5-31-2000

Checked by Working Foreman Unit Position Working Foreman Unit

Indicate below, date when reported defects were rechecked and found corrected. ☐ NOTIFIED FIRE AND A. D. T. TO REPORT SYSTEM BACK ON LINE

**LIBERTY FIRE EQUIPMENT, INC.**Post Office Box 786 ★ Kankakee, IL 60901  
815-937-9700 ★ Fax 815-937-9730

APPENDIX E (b)

RECEIVED  
JAN 19 2000

NAFED Member

INVOICE #  
**022993**

ADMIS

SOLD TO: <i>Sun Chemical</i>	SHIPPED TO:
<i>3200 Fertilizer Drive</i>	
<i>Kankakee IL 60901</i>	

Date: <i>1-10-2000</i>	Salesman: <i>Pth</i>	Shipped	P.O. #	Cash	Charge
------------------------	----------------------	---------	--------	------	--------

Qty.	Size	Inspect	Rech'g.	6 Yr. Maint.	Description	Unit Price	Amount
88	All	✓			Yearly Inspection of Fire Extinguishers	1.45	127.60
5					Wheel Unit Inspection	3.50	17.50
2					W4C5 HD Wheel Unit Covers	105.95	211.90
19					Veh. Collar Assy	3.55	67.45
14					tyre tags	.95	13.30
3					60 lbs Fire	4.30	12.90
6					Rebuilt Veh. & Items	14.75	88.50
2					6195 Dry Chem Charges	14.10	28.20
1					102 Dry Chem Bottle		16.75
1					fire extinguisher cover		15.95
					SCBA		
					Halon 1211		
					2 1/2 Gal. Water		
3	20		✓		Carbon Dioxide	8.80	26.40
					Carbon Dioxide		
					Carbon Dioxide		
4	5			✓	<input type="checkbox"/> Dry Chem. <input type="checkbox"/> Press <input type="checkbox"/> Cart. <input type="checkbox"/> Reg <input type="checkbox"/> Pk <input type="checkbox"/> ABC	7.50	30.00
2	10			✓	<input type="checkbox"/> Dry Chem. <input type="checkbox"/> Press <input type="checkbox"/> Cart. <input checked="" type="checkbox"/> Reg <input type="checkbox"/> Pk <input checked="" type="checkbox"/> ABC	12.50	25.00
7	10		✓		<input type="checkbox"/> Dry Chem. <input type="checkbox"/> Press <input type="checkbox"/> Cart. <input type="checkbox"/> Reg <input type="checkbox"/> Pk <input checked="" type="checkbox"/> ABC	12.50	87.50
4	20		✓		<input type="checkbox"/> Dry Chem. <input checked="" type="checkbox"/> Press <input type="checkbox"/> Cart. <input type="checkbox"/> Reg <input type="checkbox"/> Pk <input type="checkbox"/> ABC	18.75	75.00
					SYSTEM <input type="checkbox"/> Dry Chem <input type="checkbox"/> Wet <input type="checkbox"/> Carbon Dioxide		

Quantity	Size	Hydro Test	Unit Price	Amount
		Halon 1211		
		Water Press. CODING: 566000.404730700		
		SCBA		
3	20	Carbon Dioxide	9.00	27.00
11	10-20	Dry Chemical	8.50	93.50
		System Cylinder		

TERMS: Net 10 Days TOTAL

SALES TAX

PLEASE PAY THIS AMOUNT

964.45  
43.68  
1008.13



# SERVICE TICKET

WO create Date/Time **APPENDIX E (c)** AM/PM  
CMC System No. **118-5-813**  
RMC System No. **-**  
Ticket No. **6738504** Associate No. **21105**  
Map Location/CrossStreet  
Admin Town/Customer No. **-**  
Commit Date/Time **1 1** AM/PM  
Service Requested by:  
Ticket Priority  
PO No.

Customer Name **SUN CHEMICAL**  
Ad **3200 FESTIVAL DR**  
City/State/Zip **MANASSAS, VA 60901**  
Phone **(55) 9390136** Alternate ( )  
Contract Type Warranty Expiration **1 1**  
Maintenance Contract: Yes( ) No( ) Resl Ext Lim Warranty: Yes( ) No( )  
IN ACCORDANCE WITH AND SUBJECT TO ALL THE TERMS AND CONDITIONS SET FORTH IN OUR EXISTING CONTRACT/AGREEMENT IF ONE IS IN EFFECT.  
OR SET FORTH ON THE REVERSE SIDE HEREOF.

Check applicable boxes and insert device locations when appropriate					
SERVICE REQUEST CODES		RESOLUTION CODES		CAUSE CODES	
20	Control not arming	01	Repaired device or foil	05	Customer set off in error
23	Zone/Point in trouble	02	Replaced Device or foil	10	Lightning damage
25	No timer test received	03	Repaired control or keypad	31	False alarm
26	Device reported damaged	04	Replaced control or keypad	32	Equipment physically damaged
31	BA investigation	06	Changed PROM or control	34	Equipment malfunctioning
32	FA investigation	07	Changed customer codes	35	Reinitialized/reset control
33	HUA investigation	08	Installed temporary device	36	No ADT equipment problem
34	Supervisory System (CCM) inves.	09	*Temp disconnect of device	37	Loose/corroded wire corrected
35	CCTV - Adjustment/Repair	11	Replaced batteries	38	Equip malfunction - warranty
40	System trouble	12	Relocated device	80	Non sched contractual inspection
52	Install temporary device	14	Cleaned/cleared smoke det.	81	Scheduled inspection
53	Request to disconnect equipment	16	Perm disconnect of service	82	Customer requested inspection
56	Request to relocate device	17	*Temp disconnect of service	83	Damaged wiring
57	Cust request special inspection	18	Adjusted device sensitivity	84	No timer test
58	Damaged wiring	19	Performed customer training	91	Telco problem
60	Firmware change	20	Replaced fuse	39	Animal/pest problem
65	Telcom Failure	21	Alarm investigation	40	ADT
70	Reset system/equipment	33	Equipment tested OK	41	Actual attack/fire/etc
71	educate customer	50	Cleared by phone	42	Weather
80	on-sched contractual inspection	51	Canceled by customer		
81	Scheduled inspection	52	Canceled by ADT		
		22	Bypass point or zone		

SPECIAL INSTRUCTIONS:  
\* Estimated Reconnection or Service Resumption Date: **1 1** --- List Disconnected Devices or Systems in Comment Area Below.  
ADT Service Associate Comments: **TESTED WATERPROOFING**  
Name (Print & Sign) **J O C T. GORDON** Close Ticket..... YES(☒) No(☐)

Customer Comments:  
Please Print Name & Title:  
Signature & Date: **James E. Johnson** Date **6 130 100**

Service Call or Travel Time ( Hrs) charge (cross out improper item)	\$	Material Used: Part / SCN	Qty	Price	Ext. Price	Billing
Service Time From To					\$	\$ Labor & Material
Less service call credit and/or non chargeable time					\$	\$ Sales Tax
Additional time - billable @\$ Per Mins or fraction thereof	\$				\$	\$ TOTAL
Total Labor Charge	\$	Total Material Charge			\$	

I auth ADT to charge my  
VI Mastercard Discover Card Account Number  
Check (# ) or Cash received in the amount of \$  
(Expiration / ) for the TOTAL billing above. Customer's Signature (for credit card only)  
If check is received make sure the Customer's "Admin Town/Customer No" is noted on it.

# CANNON Fire Protection Company

950 Rand Road, Suite 208

Wauconda, IL. 60084

Telephone: 847-526-2801

APPENDIX E (d)

Facsimile: 847-526-2919

## WORK ORDER

DATE	WORK TYPE	YEAR	NUMBER	INITIAL	C.O.R. #	PRICE LIMITS	TIME CALLED	EMERGENCY
7, 7/2000	DW/IN/PT/MS					F/T&M/NTE		YES/NO

SERVICE FOR: SUN CHEMICAL

BILL TO:

ADDRESS: 3200 FESTIVAL DRIVE

ADDRESS:

CITY, ST, ZIP: KANKAKEE, IL 60901

CITY, ST, ZIP:

AUTHORIZED BY		DATE REQUESTED		PHONE		FAX			
ERIC JOHNSON		7/17/00							
PURCHASE ORDER NUMBER		DESIGN REQUIRED		SUBCONTRACTOR		CELL PHONE		PAGER	

Marketing Information: Riser Sticker Yellow Pages ☒ Previous Customer Referral? ☐ (VFP) Warrantee

DESCRIPTION OF WORK ORDERED: PERFORMED ANNUAL CAPACITY TEST OF ONE 1500 GPM FIRE PUMP AND TRIP TESTED DELUGE VALVE IN TANKER LOADING AREA.

DESCRIPTION OF ANY ADDITIONAL WORK DONE: TOOK FOAM CONCENTRATE SAMPLE FROM STORAGE TANK & WILL SEND TO LAB FOR TESTING.

DESCRIPTION FOR FUTURE INSPECTION QUOTE: 3 Wet,     Dry,     Antifreeze,     Preaction, 1 Deluge  
    Double Interlock,     Wet standpipe,     Dry standpipe, 1 Fire Pump, 1500 GPM, 65 PSI

QUAN	SIZE & DESCRIPTION	UNIT PRICE	EXTENSION	COSTS	CHARGES
				MATERIAL	MATERIAL
					TAX
				EXPENSES	FIELD
					SHOP
				GAS	DEL
					VAN
				MISC.	SUBS
					M-U
				TOTAL	MISC.
				COSTS	TOTAL
					CHARGE

NAME	DATE	FIELD		SHOP		ENGINEERING		* 4 HOUR MINIMUMS		
		ST	OT	ST	OT	ST	OT	ST. RATE*	OT. RATE	TOTAL
DON OTT	7/17/00	8								
EVEN ANDERSON	7/17/00	8								
Designer										
Truck Driver										
Shop										

Terms of Payment: 100% is due at completion. The client agrees to pay any interest, collection and/or attorney fees on any Cannon invoice past due 30 days.

SIGNATURE: Eric E. Johnson

DATE: 7/17/2000 OVERTIME OK Yes / No

PRINTED: Eric E. Johnson

FOREMAN: DON OTT

White-Office

Yellow-Customer

Pink- Accounting

# CANNON FIRE PROTECTION

F.P. Test #:

Company:

APPENDIX E (d)

Pump #

1 of 1

Test Date:

7/17/2000

3200 FESTIVAL DR.

KANKAKEE, IL

Attendees: Cannon

OTT, ANDERSON

Company

ERIC JOHNSON

Fire Department

NONE

Insurance Company

DAVE PHELPS

Tested With:

6-75' LENGTHS 2 1/2" HOSE FROM OUTSIDE MANIFOLD  
W/ HOSE MONITORS & 1 3/4" ORIFICE

Flow Point	Discharge PSI	Suction PSI	Flow GPM	Actual RPM	AMPS A-B-C	VOLTS	NET PSI
1	140	65	CHURN	1793	46-46-45	458	75
2	94	34	1501	1782	96-95-94	456	60
3	52	12	2149	1780	100-100-99	456	40
4	137	63	CHURN	1792	46-46-45	458	74
5							
6							
7							
8							

Flow Point #2

Flow Meter: -0- gpm

Nozzle #	Size inch	Coef	Pitot PSI	Flow GPM
1	1.75	1	18	378
2	1.75	1	18	378
3	1.75	1	18	378
4	1.75	1	17	367
5	1.75	1		
6	1.75	1		
7	1.75	1		

Flow Point #3

Flow Meter: -0- gpm

Nozzle #	Size inch	Coef	Pitot PSI	Flow GPM
1	1.75	1	17	367
2	1.75	1	18	378
3	1.75	1	18	378
4	1.75	1	14	333
5	1.75	1	17	367
6	1.75	1	16	356
7	1.75	1		

Flow Point #4

Flow Meter: -0- gpm

Nozzle #	Size inch	Coef	Pitot PSI	Flow GPM
1	1.75	1		
2	1.75	1		
3	1.75	1		
4	1.75	1		
5	1.75	1		
6	1.75	1		
7	1.75	1		

NOTES: 150% READINGS WERE WITH ALL 6 2 1/2" TEST VALVES WERE OPEN. - ERIC JOHNSON NOTED THAT ON 7/13/00 CONTACTS WERE MAKING EXCESSIVE AMOUNT OF NOISE FOLLOWING SEVERAL BROWN OUTS. DE. OVERGEERS CONTROLLER & PUT BACK INTO SERVICE TO STOP. T1 TERMINAL CONTACT IS BROWN - DISCOLORRED - SUGGEST CONTROLLER BE CHECKED OUT BY SPD IND. & REPAIR STARTER IF NEEDED. - PART INFO ON REVERSE SIDE OF REPORT.

Fire Pump Pressures

Start: 105 psi

Shut Off: 125 psi

Run Timer: 7 min

Jockey Pump Pressures

Start: 125

Shut Off: 140

Relief Valve Settings

Pressure: psi

Circulation: psi 125

Adjustments or Corrections Made:

CANNON FIRE PROTECTION  
950 RAND RD./ST. 208  
WAUCONDA, IL 60084

APPENDIX E (d)

Company Number: ▲  
Company Name:  
Address:

Date

City/ST/Zip

Contact Name:  
Telephone:  
Notes:

Title

Pump Number:

Serial #:

Model #:

Mfg.:

Pump Type:

Impeller Diam:

in

Discharge Pipe Diam:

in

Suction Pipe Diam:

in

Rating - Churn:

gpm @

psi

Pump Elevation:

ft

100%:

gpm @

psi

Dis. Gauge Elev:

ft

150%:

gpm @

psi

Suc. Gauge Elev.

ft

B.H.P. at capacity:

Max. B.H.P.:

at positive suct. pres.:

psi

Pump RPM:

Inb. Brg:

Max. allowable discharge pressure:

psi

Outb. Brg:

Driver - Serial #:

Model

Mfg.

Type:

HP:

RPM:

Electric - AMPS:

Volts:

SF:

Frame #:

Diesel/Gas - # cylinders:

Fuel tank size:

gals.

Tank Location:

Fire Pump Controller -

Serial #:

Model #:

Mfg.:

MOTOR STARTER - CLARK AD SMITH  
BUL 7707 TYPE CY: 3 POLES CAT. NO 77034

Jockey-Serial

Model #:

Mfg.

HP:

RPM:

gpm @

psi

Size:

x

inch

Jockey Pump Controller

Serial #

Model #

Mfg.:

APPENDIX E (d)

Company Name

Address

City/State/Zip

SUN CHEMICAL  
3200 FESTIVAL DR  
KANKAKEE, IL

Job #

Page #

Date

7/17/2000

Location: TANKER - LOMBARD AREA

DELUGE SYSTEM

Dry Valve

Trip Test Table

C.O.D.

Dry Pipe  
Operating  
Test

Make	Model	Serial No.	Make	Model	Serial No.				
Viking	D-4	728	~						
	Time to Trip Thru test Pipe		Water Pressure	Air Pressure	Trip Point Air Pressure	Time Water Reached Test Outlet		Alarm Operated Properly	
	MIN	SEC	PSI	PSI	PSI	MIN	SEC	Yes	No
Without O.O.D	-	20	145	42	35	-	10	X	
With O.O.D									

Location:

DELUGE VALVE OPERATED SATISFACTORY

Dry Valve

Trip Test Table

C.O.D.

Pipe  
Operating  
Test

Make	Model	Serial No.	Make	Model	Serial No.				
	Time to Trip Thru test Pipe		Water Pressure	Air Pressure	Trip Point Air Pressure	Time Water Reached Test Outlet		Alarm Operated Properly	
	MIN	SEC	PSI	PSI	PSI	MIN	SEC	Yes	No
Without O.O.D									
With O.O.D									

Location:

Dry Valve

Trip Test Table

C.O.D.

Dry Pipe  
Operating  
Test

Make	Model	Serial No.	Make	Model	Serial No.				
	Time to Trip Thru test Pipe		Water Pressure	Air Pressure	Trip Point Air Pressure	Time Water Reached Test Outlet		Alarm Operated Properly	
	MIN	SEC	PSI	PSI	PSI	MIN	SEC	Yes	No
Without O.O.D									
With O.O.D									

Conferred with:



**PROPERTY CONSERVATION REPORT**

**Location Name:** General Printing Ink

**Insured:** Sun Chemical "GPI Division"

**Address:** 3200 Festival Drive  
Kankakee, Illinois 60907  
United States

**Occupation:** Manufacture of printing ink.

**Reason for Visit:** Re-survey - Property

**Date of Visit:** 17 July, 2000

**People Seen:** John Kujawa, Plant Engineer

**Prepared By:** David A. Phelps, P.E.  
Senior Consultant  
847-735-1657

The purpose of this report and loss prevention program is to provide underwriting information and to assist the proposer or insured in its management of risks. The recommendations are based on conditions observed and information made available at the time of the inspection and do not imply compliance with statutory or local regulatory requirements or that there are no other risks or hazards. Implementation of the loss control measures is the responsibility of the proposer or insured. The liability of Royal & SunAlliance Insurance is limited to the insurance provided under any policies issued in respect of the property or risk concerned.

## APPENDIX E (e)

### SITE RISK SUMMARY

#### Occupancy/Operations:

This facility manufactures printing ink and base concentrate ink for the publications industry. Processes include the blending and milling of formulations of solvents, varnishes and pigments into the finished product. Indoor and outdoor bulk storage tanks are utilized. Their contents are pumped into milling machines and blending tanks in the production area prior to the finishing operations. The ink is packaged into containers which are primarily 55 gallon drums or bulk tote tanks. Provisions are made for the storage of raw materials and finished products at the site, though the quantities are somewhat limited especially for finished product. Automatic sprinkler protection is provided throughout the entire main building and is excluded for the detached pole barn and control room at the new tank farm. Where provided, the fixed protection is considered adequate.

#### Extent of Survey:

This facility was visited to conduct a property resurvey.

#### Site Description:

This is a partially developed site bounded by an Interstate highway to the east, farming fields to the south and west as well as a wooded area to the north. Construction dates back to 1974 and all buildings are in good condition. This is an industrial park area located in an unincorporated, rural section, just outside of Kankakee, Illinois. Except for the industrial plants, there are few neighbors and the area is not subjected to high crime.

#### Principle Changes

There have been no major changes in construction, occupancy or protection since the time of the last visit. There are no future changes being considered as the current time.

Testing of the fire protection system was conducted as part of this visit. A few deficiencies were noted, and it should be mentioned these are already scheduled for repair. First, there was one water flow alarm that did not operate. The past few weeks there were multiple false alarms from the flow switch that caused the fire department to respond. It has been determined the switch was faulty and a replacement has been ordered. This is to be installed later in the week. Until it is installed, the alarm has been by-passed through the control panel. Second, the Halon system control panel was showing a trouble condition. The contractor was scheduled to visit the site for its semi-annual test the next day and this is expected to clear up any problems.

The contact switch in the main fire pump control panel is expected to be serviced in the near future. After several brown-outs in the area, it has been observed making unusual noises and also is showing dark spots. An electrical contractor will need to visit the site and make a final determination as to the proper course of action.

## APPENDIX E (e)

### WATER SUPPLY TEST RESULTS

#### Fire Hydrant Tests:

Date	By	Source Tested	Flow Location	Pressure Location	Test Data		
					Flow (gpm)	Static (psi)	Resid. (psi)
07/1996	Contractor	10 inch city main	Fire pump test header	Fire pump suction	1500	65	45
08/1998	Contractor	10 inch city main - Festival Drive	Street hydrant	Adjacent hydrant	1040	78	68

#### Sprinkler Tests - 2" Drains, Alarms, Valves

Date	By	No. of Risers		Test Data			Alarms Rec'd		Valves	
		# On Site	# Tested	Init. Static (psi)	Resid. (psi)	Final Static (psi)	Local	Central	# On Site	# Tested
07/2000	DAP	4	4	65	65	55	yes	yes	12	12

#### Fire Pumps:

Pump	100% Rating			Suction SOURCE	Driver	Pressure Settings			
	(gpm)	(psi)	(rpm)			Jockey (psi)		Fire Pump (psi)	
1	1500	65	1775	10 inch city main - Festival Drive	Electric	Start	Stop	Start	Stop
						125	140	105	125

#### Fire Pump Tests:

Date	By	Pump	Flow Location	Test Data					Adjusted Data		Rating
				Flow (gpm)	Speed (rpm)	Suct. (psi)	Disch. (psi)	Net (psi)	Flow (gpm)	Net (psi)	
07/2000	Contract or	1	Test Header	0	1793	65	140	75	0	74	Good
07/2000	Contract or	1	Test Header	1501	1782	34	94	60	1,495	60	Good
07/2000	Contract or	1	Test Header	2149	1780	12	52	40	2,143	40	Good



## APPENDIX F

January 17, 2000

Mr. William Chigaros  
Chairman L.E.P.C.  
Planning Committee  
Kankakee County Emergency  
Services and Disaster Agency  
470 East Merchant Street, Room 104  
Kankakee, IL 60901

Dear Mr. Chigaros:

I enjoyed the opportunity to meet with you and Rich Furlong on Friday, January 14<sup>th</sup>. Although it was apparent that you were well aware of the presence of the Sun Chemical facility, it did give Rich exposure.

A number of questions arose at the time, and I would like to update you as to our intentions.

- 1) Question – Were tanks in the tank farm identified with placards?

Answer – I found the new vertical tanks identified with the placards. The older horizontal tanks were not placarded. However, they will be as soon as favorable weather is at hand.

- 2) Question – Were hydrants marked on the site plan?

Answer – No, but they will be. Along with the hydrants, the revised site plan will also include PIV's, water cannons, risers and the Siamese connection.

- 3) Question - Do we have a secondary assembly point when evacuating?

Answer - No, a second assembly point is not under consideration at this time. The day shift has the largest number of employees and that is only about 28. The general consensus is that, with so few people to account for, it would be best to concentrate them into a single group.

The most likely exposure from a chemical release or a fire would occur in the process area or the tank farms. In both instances, the escape route would be to the northwest, north or northeast. The current assembly point should serve well.

- 4) Question – Is the entire plant sprinkled?

Answer – Yes, the entire plant is sprinkled in one form or another.

- a. The main plant facility is sprinkled with a water and foam mix.

## APPENDIX F

- b. The office area is sprinkled with water only.
- c. MCC #1 and MCC #2 are protected with a Halon system.
- d. MCC #3 is protected by a water system.
- e. The new MCC Building is protected by fire extinguishers only.
- f. The tank farms outside are protected by water cannons, wheeled fire extinguishers and standard fire extinguishers.
- g. The laboratory is protected by the standard water and foam system.
- h. The garage is protected by fire extinguishers only.

5) Question – How many pumps served the main sprinkler system?

Answer – There is one 1500 gpm main pump and one jockey pump.

This is just meant as an update. When the drawings are revised, you will receive both, the files on disk and a print out.

If there are any other items of concern, please let me know. I can be reached at 939-6655.

Sincerely,

John J. Kujawa  
Plant Engineer  
Sun Chemical



# SunChemical

John J Kujawa  
Plant Engineer  
Publication Gravure

Sun Chemical Ink (GPI)  
Sun Chemical Corporation  
3200 Festival Drive  
Kankakee IL 60901  
815 939 0136  
815 939 9833 Fax  
708 496 5924 Bedford Park

<http://www.sunchemical.com>

P 140 896 513

US Postal Service

## Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent To	
John Kujawa	
Street & Number	
3200 Festival Dr.	
Post Office, State, & ZIP Code	
Kankakee, IL 60901	
Postage	\$ 77
Certified Fee	1.40
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	1.25
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$ 3.42
Postmark or Date	

CHICAGO IL 3 JUL 2000

SunChemical ILD 075 603886  
PS Form 3800, April 1995

Sharrow D 5-95

### SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

John Kujawa  
Sun Chemical  
3200 Festival Dr.  
Kankakee, IL  
60901

2. Article Number (Copy from service label)

P140 896 513

### COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

7-5-00

C. Signature

X Helen J. Warchol ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail  
☒ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

*LOG < 90 days*

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (&gt;1000 KG/MO.)</b>	
	<b>SUBPART A: GENERAL</b>	
722.111	<b>Section 722.111 Hazardous Waste Determination</b> Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.111
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	808.121(a)
722.112(a)	<b>Section 722.112 USEPA Identification Numbers</b> Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	<b>SUBPART B: THE MANIFEST</b>	
722.120(a)	<b>Section 722.120 General Requirements</b> Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(d)
	<b>Section 722.121 Acquisition of Manifests</b> Has the generator used:	
722.121(a)	- an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
722.122	<b>Section 722.122 Number of Copies</b> Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	<b>Section 722.123 Use of the Manifest</b> For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
722.123(b)		722.123(b)

*Some missing gen copy*

*one get*

*one get*

*gen copies missing*



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(c)	<p>— has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.123(c)
	<p><b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b></p> <p>Is there any hazardous waste ready for transport off-site?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>If so, is the generator complying with the pre-transport requirements in Subpart C?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Section 722.134 Accumulation Time</b></p> <p>Has the generator complied with the following requirements:</p> <p>Yes _____ No _____ N/A _____</p> <p>722.134(a) A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I? <i>use of</i></p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____ <i>Containers</i></p> <p>and/or</p> <p>B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J (except Sections 725.297(c) and 725.300)?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/> <i>per exceptions</i></p> <p>and/or</p> <p>C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>and/or</p> <p>D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>722.134(a)(2) For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>722.134(a)(3) For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>722.134(a)(4) Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)?</p> <p>Yes _____ No _____ N/A _____</p> <p>Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:</p> <p>Does the facility accumulate hazardous waste in containers? <input checked="" type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>If "No", go to Subpart J.</p> <p><b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b></p> <p>Has the generator closed an accumulation area?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>(725.211) If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?</p> <p>(725.214) Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>(725.271) If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>(725.272) Is the waste compatible with the container and/or liner?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>(725.273a) Are containers of hazardous waste always closed except to remove or add waste during accumulation?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.273b)	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) <i>pavement cracked</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<del>Yes</del> <del>No</del> <del>N/A</del> yes
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> COMMENTS:          Does the generator accumulate and/or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Note: If "No", go to Subpart C.	
	<b>SUBPART J: TANK SYSTEMS</b>  Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> (725.211) If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? (725.214) Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> (725.290) Does the facility accumulate or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit. If "No", skip Subpart J. a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293. b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.  (725.291a) For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291b)	<p>Does this assessment consider at least the following:</p> <p>1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) hazardous characteristics of the wastes? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) existing corrosion protection measures? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) documented age of the tank system? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>*IRPE = Independent Registered Professional Engineer</p>	
(725.291c)	<p>Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).</p>	
(725.292a)	<p>For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the assessment include, at a minimum, the following:</p> <p>1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.292g)	<p>Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293a)	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>or</p> <p>if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293b)	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293c)	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> <li>compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> <li>placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> <li>provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> <li>sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> </ol> <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p> <p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> <li>a liner (external to the tank); or</li> <li>a vault; or</li> <li>a double-walled tank; or</li> <li>an equivalent device (approved by the Board)?</li> </ol> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If "No":</p> <ol style="list-style-type: none"> <li>Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> <li>Are welded flanges, joints and connections inspected daily?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> <li>Are sealless or magnetic coupling pumps and sealless valves inspected daily?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> <li>Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> </ol> <p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <ol style="list-style-type: none"> <li>For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> <li>For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> <li>Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> </ol> <p><b>Note:</b> If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	

*Satellite Accumulation Area 11*

*Area 559*

*Equipment*

*725.293d*

*1-559*

*Whole Area*

*2007*

*2003*

*2003*

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.294a)	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.294b)	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 2) overflow prevention controls? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 3) sufficient freeboard in uncovered tanks? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.294c)	<b>Note:</b> If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295a)	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overflow/spill control equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 2) the aboveground portion of the tank system for corrosion or releases? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 3) data from monitoring equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 4) the construction materials and the area immediately surrounding the external portion of the system? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.295b)	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.295c)	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A <input checked="" type="checkbox"/> b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A <input checked="" type="checkbox"/> c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A <input checked="" type="checkbox"/> d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A <input checked="" type="checkbox"/> d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> <b>Note:</b> Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296e)	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.296f)	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297a)	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.297a)	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.297b)	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	
(725.298a)	<p>Are ignitable or reactive wastes placed in a tank system?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:  - the resulting waste, mixture or dissolved material is no longer ignitable or reactive?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>- Section 725.117(b) is complied with?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>or  Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>or  Is the tank used solely for emergencies?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.298b)	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.299)	<p>Are incompatible wastes/materials placed in the same tank?  Yes _____ No _____ N/A _____ ✓</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with?  Yes _____ No _____ N/A _____ ✓</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with?  Yes _____ No _____ N/A _____ ✓</p> <p>COMMENTS:</p>	
(725.131)	<p><b>SUBPART C: PREPAREDNESS AND PREVENTION</b></p> <p>Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?  Yes _____ ✓ No _____ N/A _____</p>	
(725.132)	<p>Is the facility equipped with the following, if necessary:</p> <p>a) an internal communication or alarm system(s)?  Yes _____ ✓ No _____ N/A _____</p> <p>b) a telephone or other device to summon emergency assistance from local authorities?  Yes _____ ✓ No _____ N/A _____</p> <p>c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment?  Yes _____ ✓ No _____ N/A _____</p> <p>d) water at adequate volume and pressure for fire control?  Yes _____ ✓ No _____ N/A _____</p>	
(725.133)	<p>Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment?  Yes _____ No _____ N/A _____</p>	
(725.134)	<p>a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device?  Yes _____ ✓ No _____ N/A _____</p> <p>b) If there is ever just one employee on the premises when the facility is operating does he/she have immediate access to a device capable of summoning external emergency assistance?  Yes _____ No _____ ✓ N/A _____</p>	
(725.135)	<p>Is the facility maintaining adequate aisle space?  Yes _____ ✓ No _____ N/A _____</p>	
(725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <p>arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes?  Yes _____ No _____ ✓ N/A _____</p> <p>agreements designating the primary authority where more than one police or fire department might respond?  Yes _____ No _____ ✓ N/A _____</p> <p>agreements with State emergency response teams, contractors and equipment suppliers?  Yes _____ No _____ ✓ N/A _____</p> <p>arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility?  Yes _____ No _____ ✓ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)			Violation
	<b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b>			
725.151a)	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>			<i>Date of Plan 9-28-97 w/ revisions Kind of Lay</i>
(725.151b)	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			
(725.152a)	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? <i>Spills</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>			
(725.152c)	Does the plan describe arrangements with: - police and fire departments? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>			
(725.152d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>			<i>missing</i>
(725.152e)	Does the plan identify all emergency equipment including: - description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - capability? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>			
(725.152f)	Does the plan include: - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>			
(725.153)	Has the contingency plan (including all revisions) been: a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) submitted to: - police department? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - fire department? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - hospital? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>			
(725.154)	Has the contingency plan been reviewed and revised whenever: a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) the plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c) the facility changes in a way that modifies the emergency response necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) information regarding emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> e) information regarding equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>			
(725.155)	Is the emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>			



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p><b>Note:</b> If the facility has had a release, explain in detail.</p>	
(725.116a)	<p><b>Section 725.116 Personnel Training</b></p> <p>Does the facility have a training program? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A _____</p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A _____</p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> <li>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- key parameters for automatic waste feed cut-off systems? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- communications or alarm systems? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- response to fire or explosions? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- response to groundwater contamination incidents? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- shutdown of operations? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> </ul>	<p>maybe - no proof no agenda no syllabus</p>
(725.116b)	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	no evidence
(725.116c)	<p>Have facility personnel received an annual review of the initial training? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	no evidence of date
(725.116d)	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No _____ N/A _____</li> <li>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> </ol>	not specifically
(725.116e)	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	not specifically

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107a4)	<b>Section 728.107 Waste Analysis and Recordkeeping</b> Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A _____ Is the plan on-site? Yes _____ No _____ N/A _____ Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A _____ Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A _____ Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A _____	
722.134(c)	<b>Section 722.134 Satellite Accumulation</b> Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste 722.134(c) limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes _____ No _____ N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes _____ No _____ N/A _____ If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A _____ During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No _____ N/A _____	722.134(c)  <i>Idrum needed to be moved no data</i>
	<b>SUBPART D: RECORDKEEPING AND REPORTING</b> <b>Section 722.140 Recordkeeping</b> Has the generator retained for a period of 3 years: — a copy of each signed manifest? Yes _____ No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes _____ No _____ N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: — copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes _____ No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A _____	722.140(d)
722.141(a)	<b>Section 722.141 Annual Reporting</b> Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes _____ No _____ N/A _____ <b>Note:</b> If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes _____ No _____ N/A _____	722.141(b)



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.142(a)(1)	<b>Section 722.142 Exception Reporting</b> If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes _____ No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(2)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.143
	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b>  Is the generator an exporter of hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b>  Is the generator an importer of hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
	<b>SUBPART G: FARMERS</b>  Is the generator a farmer? Yes _____ No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
	COMMENTS:	

*2 manifests (see list)*

*Annual Reports*

SBREFA Handout  
Given

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**  
**BUREAU OF LAND/FIELD OPERATIONS SECTION**  
**RCRA INSPECTION REPORT**

**GENERAL FACILITY INFORMATION**

USEPA ID #:	ILD 075 603 886	IEPA ID #:	N/A
Facility Name:	Sun Chemical Ink / Corporation	Phone #:	815-939-0136
Location:	3200 Festival Drive	County:	Kankakee
City:	Kankakee	State:	IL
Region:	Maywood	Zip Code:	60901
Weather:	Slight Rain $\approx 50^{\circ}\text{F}$	Inspection Date:	5/21/00
		Time:	9:50

**TYPE OF FACILITY**

Notified As:	Container Storage (TSD) 790 days	Regulated As:	Closure $\rightarrow$ LCR storage 290 days
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**TYPE OF INSPECTION**

<input checked="" type="checkbox"/> CEI:	<input type="checkbox"/> CME/O&M:	<input type="checkbox"/> CSI:	<input type="checkbox"/> NRR:	<input type="checkbox"/> CCI:	<input type="checkbox"/> PIF:	<input type="checkbox"/> CVI:	<input type="checkbox"/> CSE:	<input type="checkbox"/> CAO:
F/U to:	Other:							

**NOTIFICATION INFORMATION (EPA 8700-12)**

Notification Date:	8/12/80 (initial)	(subsequent)
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**PART A PERMIT INFORMATION (EPA 3510-3)**

Part A Date:	Nov. 19, 1980	Amended:	Withdrawn:
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**PART B PERMIT INFORMATION**

Part B Submitted:	N/A	Issued:	(check one)	Date:
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**ACTIVE ENFORCEMENT**

The company has been referred to USEPA:	N/A	IAGO:	County State's Attorney:
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**ACTIVE ENFORCEMENT ORDERS**

CACO:	N/A	CAFO:	Federal Court Order:
Consent Decree:	N/A	IPCB Order:	State Court Order:

# Manifest / LDR Review

INA 1443430 -

gen. copy not mailed to IL  
out of state copy not mailed to IN  
missing facility signature copy

~~MI~~ 7925051

no TSD Sign / LDR w/o signature

IL 8506894 missing LDR &  
gen. copy

MI 7870937 - no LDR / ~~no gen copy~~  
sign.

IL 7451139 no LDR / no gen copy

IL 8506848 no gen copy / no LDR

MI 7870570 no sign on LDR

MI 7870837 no LDR

MI 7870634 no LDR

~~MI 7325043 - no gen copy / no LDR~~  
keep!  
~~MI 7325043~~  
sign.

MI 7228175 LDR sign.

## TSD FACILITY ACTIVITY SUMMARY

[illegible]

OWNER

## OPERATOR

Name: <i>Sun Chemical Ink / Sun Chemical Corporation</i>	Name: <i>Sun Chemical Corporation</i>
Address:	Address:
City:	City:
State:                                  Zip Code:	State:                                  Zip Code:
Phone #:	Phone #:

**PERSON(S) INTERVIEWED**

**TITLE**

PHONE #

John T. Kajawa	Plant Engineer	815 939-0136

## INSPECTION PARTICIPANTS

AGENCY/BUREAU

PHONE #

Diane Sharrow	USEPA - WPTD/ECAB	312-886-6199
Sheila Burras	USEPA - WPTD/ECAB	312-886-3587

PREPARED BY

AGENCY/BUREAU

PHONE #

Frank Sharrow	USEPA-WPTD/ECAB	312-886-6199
---------------	-----------------	--------------

Retro Chem

MI 722 8009 LDR sign.

MI 7231245 "

MI 7231132 "

MI 732 2392 "

IL 8142640 ~~be~~ LDR ~~form~~  
form signature

P140 896513

JUN 30 1990

DE-9J

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. John J. Kujawa  
Plant Engineer  
Sun Chemical Company  
3200 Festival Drive  
Kankakee, Illinois 60901

Re: Notice of Violation  
Compliance Evaluation Inspection  
EPA I.D. No.: ILD 075 603 886

Dear Mr. Kujawa:

On May 22, 2000, representatives of the United States Environmental Protection Agency (U.S. EPA) inspected Sun Chemical Company located in Kankakee, Illinois (Sun Chemical). The purpose of the inspection was to evaluate Sun Chemical's compliance with the Standards Applicable to Generators of Hazardous Waste, the Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities, and the Land Disposal Restrictions set forth at 35 Illinois Administrative Code (Title 35: IAC Environmental Protection, Subtitle G: Land Pollution, Chapter I: Pollution Control Board). Enclosed please find a copy of our inspection report.

Based on the May 22, 2000, inspection, we have determined that Sun Chemical Company is violating the following regulations.

~ IAC Part 722: Standards Applicable to Generators of Hazardous Waste:

Section 722.123(a) - For each manifest, the generator must send Part 5 to the Illinois Environmental Protection Agency (IEPA) within two working days. Sun Chemical failed to mail one copy of



a hazardous waste manifest to the IEPA, as well as a copy to the State in which the receiving facility was located.

Section 722.134(a)(2) - For hazardous waste in containers, the generator must mark and make visible for inspection on each container, the date upon which accumulation began, the words "hazardous waste" and the hazardous waste code(s). Sun Chemical failed to clearly mark four hazardous waste containers with the words hazardous waste, the accumulation date and the appropriate hazardous waste codes.

Section 722.134 © - The facility or installation must limit satellite accumulation to 55 gallons (110 kilograms) and mark the containers with the words, "Hazardous Waste". When the 55 gallon limit is met, the facility or installation must mark the container with an accumulation start date and move the container to a hazardous waste storage area within three days of the accumulation start date. Sun Chemical does not have interim status or a permit. Sun Chemical failed to label and move one 55 gallon drum to the hazardous waste storage area.

Section 722.142(a)(1) - the facility or installation must contact the receiving facility within 35 days of the date of delivery of hazardous waste to a transporter if the generator had not received a copy of the manifest from the receiving facility. The facility or installation failed to contact the receiving facility on two manifests for which copies from the receiving copies were missing.

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Section 725.137 - Arrangements with local emergency authorities must be made to familiarize them with the layout of the facility or installation, the properties of hazardous waste managed, places where personnel are working, entrances and evacuation routes. Sun Chemical did not have records that preparedness and prevention arrangements had been attempted with the local emergency authorities.

Section 725.152(c), (d) and (e) - The contingency plan must describe arrangements with the police and fire departments,

hospitals, contractors and emergency response teams, contain the emergency coordinator's home address, and identify and describe the capability of all emergency equipment. Sun Chemical did not describe the arrangements with local authorities, contain the emergency coordinator's home address, nor identify the capability of all emergency equipment.

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Section 725.116(a) through (d) - The facility or installation must have a personnel training program that covers, at a minimum, 1) the procedures to familiarize personnel with emergency procedures, emergency equipment and emergency systems; 2) the procedures for using, inspecting, repairing and replacing emergency and monitoring equipment; 3) communications and alarm systems; 4) response to fires and explosions; 5) response to groundwater contamination incidents; and 6) shutdown of operations. The facility or installation must also train all new employees within six months of the date of employment, and conduct an annual review of the initial training. Documents and records must be kept by the facility or installation including job titles, job descriptions, description of hazardous waste training, and records that document the training given to facility or installation personnel. The facility or installation must keep these training records until closure of the facility or installation or for at least three years for former employees. Sun Chemical did not have records that demonstrated that the training program was in place, that new employees had been trained within six months of employment, that employees had received an annual review, and that all required records were being maintained.

#### IAC Part 728: Land Disposal Restrictions:

Section 728.107 - Copies of land disposal certifications must be kept at the facility or installation. Sun Chemical was missing certified/signed copies of land disposal restrictions for fifteen shipments of hazardous waste in the last three years.

According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period.

Although this letter is not such an order, we request that you submit a written response to the violations cited above within 30 days of receipt of this letter. The response should document the actions, if any, which you have taken since the inspection to comply with the above requirements. You should submit your response to Diane Sharrow, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604.

If you have any questions regarding this matter feel free to contact Diane Sharrow, of my staff, at (312) 886-6199.

Sincerely,

Lorna M. Jereza, P.E., Chief  
Compliance Section 1  
Enforcement and Compliance Assurance Branch  
Waste, Pesticides and Toxics Division

Enclosure

cc: Cliff Gould, IEPA  
Todd Marvel, IEPA

DE-9J/DS:be/filename:SunChem.NOV.wpd

**ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH**

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
<i>BE 6/27/00</i>					
AUTHOR/ TYPIST	COMPLIANCE SECTION 1 SECTION CHIEF	COMPLIANCE SECTION 2 SECTION CHIEF	CA SECTION SECTION CHIEF	ECAB BRANCH CHIEF	WPTD DIVISION DIRECTOR
<i>[Signature] 6/29/00</i>	<i>[Signature] 6/30/00</i>				

 Leverett Nelson

06/26/2000 10:10 AM

To: Lorna Jereza

Subject: Re: NOV's- Sun Chemical Company and Combe Laboratories 

These look fine. Go ahead with them. Thanks.

Lorna Jereza



16

AM

To: Leverett Nelson cc: Diane Sharrow



Sun Chem.Nov.



Combe Labs.NOV.

For your perusal.  
Thanks!

U.S. EPA - Region 5  
Waste, Pesticides and Toxics Division  
Enforcement and Compliance Assurance Branch

CEI INSPECTION REPORT

FACILITY NAME: Sun Chemical Company/Sun Chemical Ink  
USEPA ID NO: ILD 075 603 886  
FACILITY ADDRESS: 3200 Festival Drive  
Kankakee, Illinois 60901  
FACILITY TYPE: Large Quantity Generator  
FACILITY REPRESENTATIVE: John Kujawa, Plant Engineer  
USEPA INSPECTOR: Diane Sharrow and Sheila Burrus  
STATE INSPECTOR: None  
DATE OF INSPECTION: May 22, 2000  
NAIC CODE: 0000  
INSPECTION PRIORITY,  
SECTOR AND/OR PROCESS: TSD  
PBTs: None

*[Handwritten Signature]*  
4/23/00

INTRODUCTION:

Prior to the completion of a Compliance Evaluation Inspection (CEI) at this Facility, all files in the RCRA File Room were reviewed. From review of the files and the RCRIS database it was determined that Sun Chemical Corporation had notified the U.S. EPA of its hazardous waste activities on or about August 12, 1980. Sun Chemical Corporation had originally notified as a TSD with container storage greater than 90 days. A Part A permit application was submitted on or about November 19, 1980, for two hazardous waste storage areas. This Part A was later withdrawn and the two greater than 90 days storage areas were closed. No process or sector manuals were reviewed prior to the CEI. There are no known hazardous waste permits or orders in existence for this facility.

FACILITY BACKGROUND:

Sun Chemical Corporation manufactures commercial printing inks at this Facility. The primary waste streams are waste inks and solvents, including RCRA hazardous waste codes D001, D007, F003, F005. The Facility has operated at the Kankakee location since approximately 1974. Hazardous waste is stored in 55-gallon drums at the rear of the Facility in an outdoor less than 90 day hazardous waste storage area. See the attached Facility Location and Facility Layout from the Preliminary Assessment / Visual Site

Inspection (PA/VSI).

COMPLIANCE EVALUATION INSPECTION:

We arrived at the Facility at approximately 10:00 am CST. We introduced ourselves to the Receptionist and presented our Enforcement / Inspection Credentials. We were referred to John Kujawa, the Plant Engineer. We then re-presented our credentials to Mr. Kujawa. Diane Sharrow then made a brief introduction as to the purpose of the inspection, and in compliance with the *Small Business and Regulatory Fairness Act, (SBREFA)*, provided Mr. Kujawa with a copy of the U.S. EPA Information Sheet entitled, *Information for Small Businesses*.

We then went to the hazardous waste storage area. Seven 55-gallon drums of hazardous waste were in the outdoor storage area. All of the drums were labeled as hazardous waste and dated. However, dates on four of the drums were barely legible due to exposure to the elements. The pavement in the storage area was cracked in several areas. We then proceeded inside the plant. We stopped inside the laboratory. No hazardous waste generation or accumulation was conducted in this area. We then entered the production area where two 55 gallon drums were being used for satellite accumulation in the "Base Pigments Production Area". One drum was full and had not been dated with the start of accumulation. No photographs were taken.

A record review was then initiated. A review of the manifests indicated that several manifests were not properly mailed, or did not have signed copies. Several manifests were also missing Land Disposal Restriction (LDR) Forms or signatures on the LDRs.

MANIFEST NO. - VIOLATION SUMMARY

INA 1443430 - Generator copy not mailed to IL. Out-of-state copy not mailed to IN. No TSD signature.  
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IL 8506894 - No generator copy. No LDR.  
MI 7870937 - LDR not signed.  
IL 7451139 - No generator copy. No LDR.  
IL 8506848 - No generator copy. No LDR.  
MI 7870570 - LDR not signed.  
MI 7870837 - No LDR.  
MI 7870634 - No LDR.  
MI 7325043 - No generator copy. LDR not signed.  
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MI 7228009 - LDR not signed.  
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Further review of records for preparedness and prevention indicated that Sun Chemical Company did not have evidence of testing and maintenance of the communication/alarm systems, fire protection equipment, spill control equipment and decontamination equipment. As well, there was no written evidence of planned arrangements with local agencies, the contingency plan did not discuss the capability of emergency equipment, the contingency plan did not contain the emergency coordinator's home address, and there was no evidence that the contingency plan had been submitted to the local hospital, police and fire departments. Review of the personnel training records indicated that Sun Chemical did not have records of a training program that met the requirements of 35 Illinois Administrative Code (Title 35: Environmental Protection, Subtitle G: Land Pollution, Chapter I: Pollution Control Board), or the "regulations".

#### FINDINGS:

Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, the Administrator of U.S. EPA may authorize a state to administer the RCRA hazardous waste program in lieu of the federal program when the Administrator finds that the state program meets certain conditions. Any violation of regulations promulgated pursuant to Subtitle C (Sections 3001-3023 of RCRA, 42 U.S.C. §§ 6921-6939e) or of any state provision authorized pursuant to Section 3006 of RCRA, constitutes a violation of RCRA, subject to the assessment of civil penalties and issuance of compliance orders as provided in Section 3008 of RCRA, 42 U.S.C. § 6928.

Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), the Administrator of U.S. EPA granted the State of Illinois final authorization to administer a state hazardous waste program in lieu of the federal government's base RCRA program effective January 31, 1986. 51 Fed. Reg. 3778 (January 31, 1986). The Administrator of U.S. EPA granted Illinois final authorization to administer certain HSWA and additional RCRA requirements effective March 5, 1988, 53 Fed. Reg. 126 (January 5, 1988); April 30, 1990, 55 Fed. Reg. 7320 (March 1, 1990); June 3, 1991, 56 Fed. Reg. 13595 (April 3, 1991); August 15, 1994, 59 Fed. Reg. 30525 (June 14, 1994); May 14, 1996, 61 Fed. Reg. 10684 (March 15, 1996); and October 4, 1996, 61 Fed. Reg. 40520 (August 5, 1996). The U.S. EPA-authorized Illinois regulations are codified at 35 Illinois

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Treatment, Storage and Disposal Facilities:

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Section 725.153, Section 725.116(a) through (d)

Part 728: Land Disposal Restrictions

Section 728.107

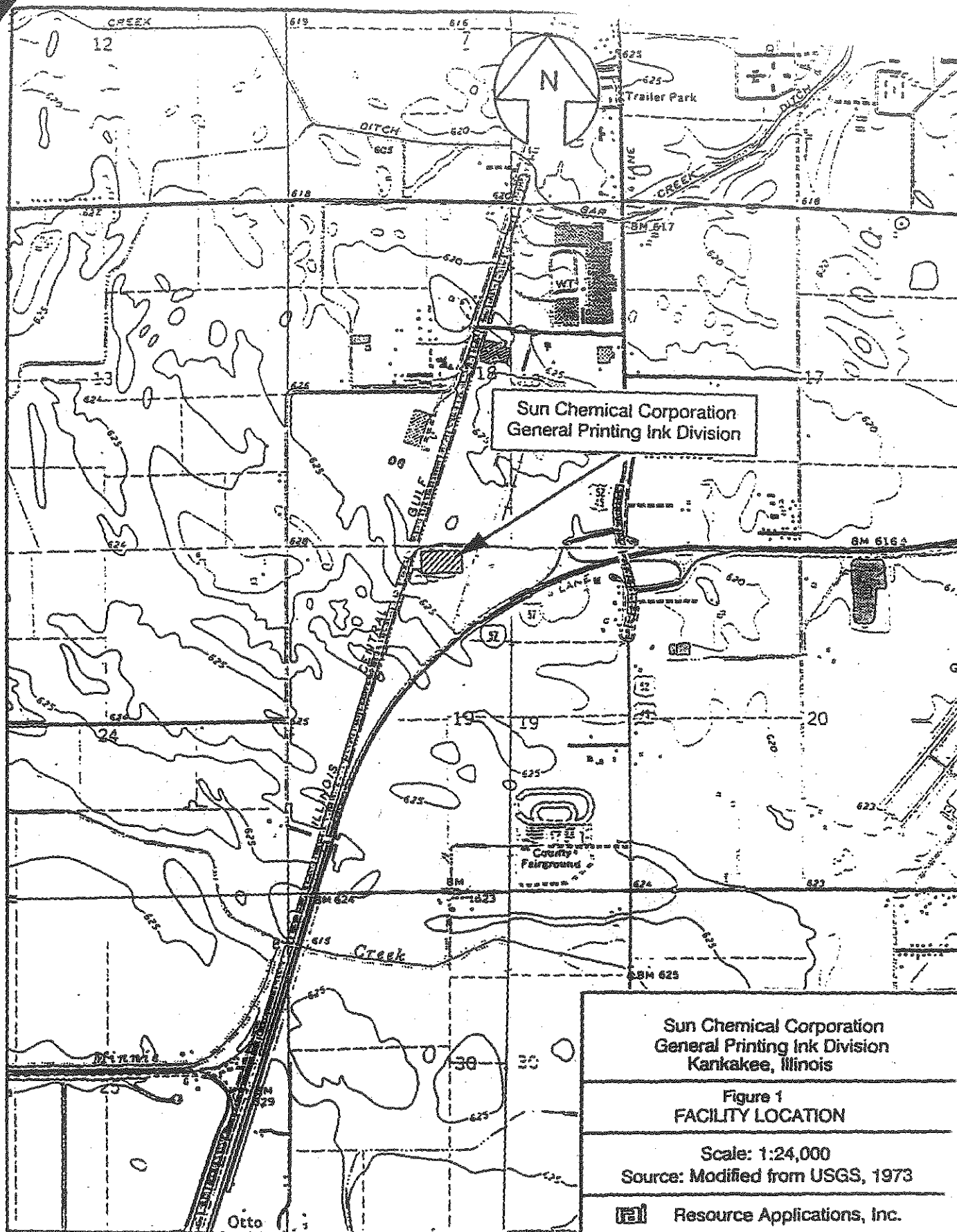
FOLLOW-UP:

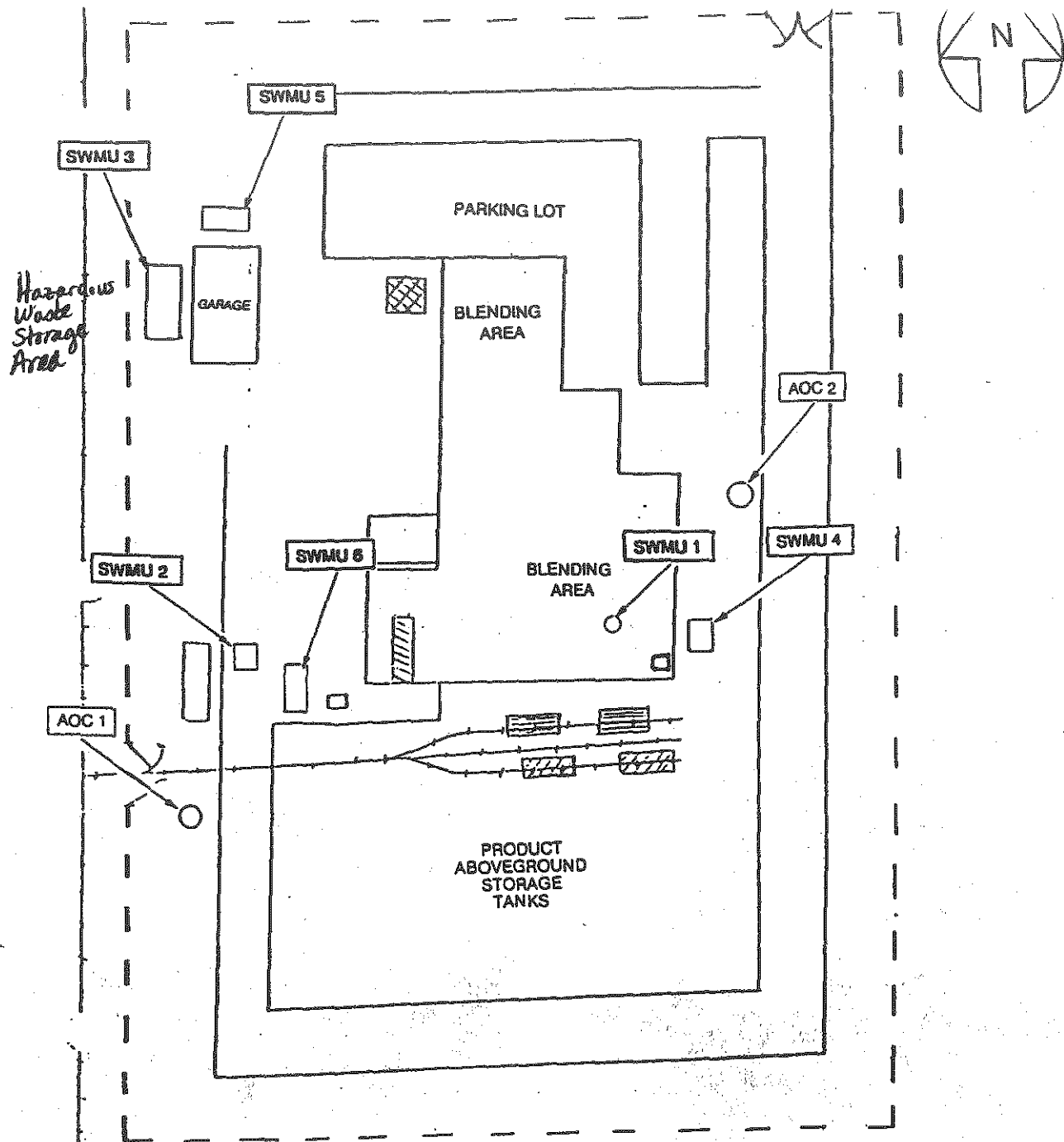
A Notice of Violation will be issued to Sun Chemical Company.

Attachments:

Facility Location  
Facility Layout







**Solid Waste Management Unit (SWMU)**

1. Hazardous Waste Satellite Accumulation Area
2. Nonhazardous Waste Storage Area
3. Hazardous Waste Storage Area
4. Wastewater Storage Tank
5. Former North Hazardous Waste Storage Area
6. Former South Hazardous Waste Storage Area

**Area of Concern (AOC)**

1. Area of the Diesel Fuel Underground Storage Tank
2. Area of the Oil Underground Storage Tank

Sun Chemical Corporation  
General Printing Ink Division  
Kankakee, Illinois

Figure 2  
FACILITY LAYOUT/SWMU AND AOC LOCATIONS

Scale: 1" = 85'  
Source: Modified from SUN sketch  
received by RAI on May 22, 1992

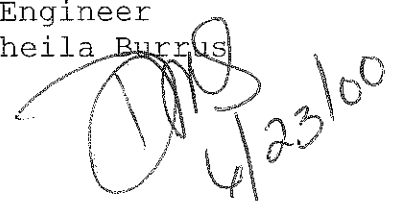


Resource Applications, Inc.

U.S. EPA - Region 5  
Waste, Pesticides and Toxics Division  
Enforcement and Compliance Assurance Branch

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Section 728.107

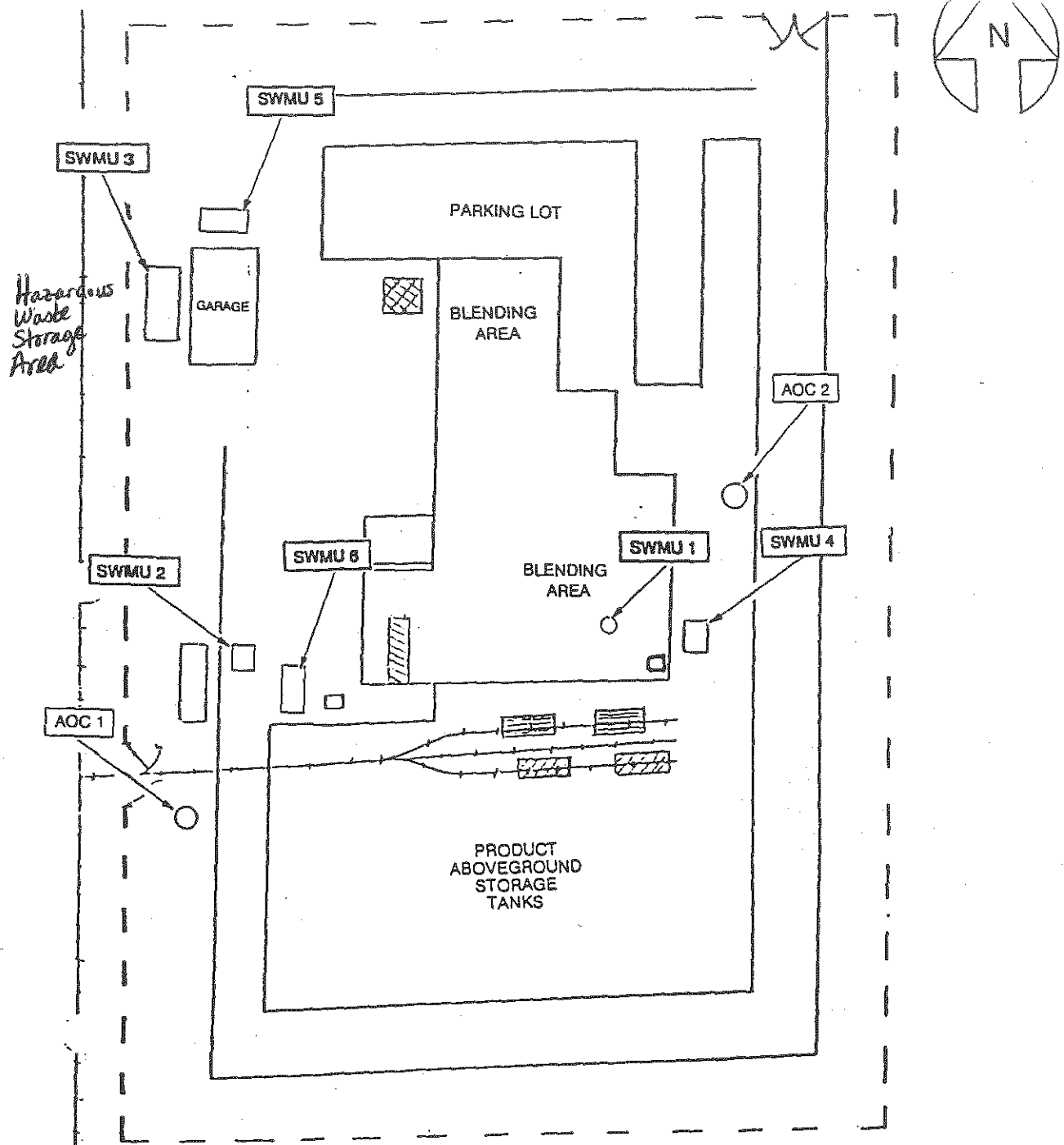
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Resource Applications, Inc.



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**RETURN RECEIPT REQUESTED**

John J. Kujawa  
Plant Engineer  
Sun Chemical Company  
3200 Festival Drive  
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If you have any questions regarding this matter feel free to contact Diane Sharrow of my staff at (312) 886-6199.

Sincerely,

Lorna M. Jereza, P.E., Chief  
Compliance Section 1  
Enforcement and Compliance Assurance Branch  
Waste, Pesticides and Toxics Division

Enclosure

cc: Cliff Gould, IEPA

Sun Chemical  
Kankakee Plant  
3200 Festival Drive  
Kankakee, IL 60901

*Certificate Master Listing*

22-May-2000  
1 of

<u>Certificate No.</u>	<u>Certificate Name</u>	<u>Refresher Period</u>
6600000001	NEW EMPLOYEE OVERVIEW	0 Year(s)
6600000002	INTERNAL AUDITOR CERTIFICATE	0 Year(s)
6600000003	LEAD ASSESSOR CERTIFICATE	0 Year(s)
6600000004	MANAGEMENT REP. CERTIFICATE	0 Year(s)
6600000005	ISO COORDINATOR CERTIFICATE	0 Year(s)
6600000006	QUALITY ASSURANCE CERTIFICATE	0 Year(s)
6600000007	QUALITY CONTROL CERTIFICATE	0 Year(s)
6600000008	SENIOR TECHNICIAN CERTIFICATE	0 Year(s)
6600000009	LEAD TECHNICIAN CERTIFICATE	0 Year(s)
6600000010	ELECTRICIAN CERTIFICATE	0 Year(s)
6600000011	MAINTENANCE CERTIFICATE	0 Year(s)
6600000012	SHIPPING RECEIVING CERTIFICATE	0 Year(s)
6600000013	INK MAKING CERTIFICATE	0 Year(s)
6600000014	BLENDING CERTIFICATE	0 Year(s)
6600000015	GENERAL OFFICE CERTIFICATE	0 Year(s)
6600000016	ADVANCED OFFICE CERTIFICATE	0 Year(s)
6600000017	BASIC FIRE SAFETY CERTIFICATE	0 Year(s)
6600000018	HEARING TEST CERTIFICATE	0 Year(s)
6600000019	FORKLIFT CERTIFICATE	1 Year(s)
6600000020	BASIC ISO OVERVIEW CERTIFICATE	0 Year(s)
6600000021	DOCUMENT CONTROL CERTIFICATE	0 Year(s)
6600000022	DOT REQUIREMENTS CERTIFICATE	0 Year(s)
6600000023	TRAINING SYSTEM CERTIFICATE	0 Year(s)
6600000024	SUPERVISOR CERTIFICATE	0 Year(s)
6600000025	HMS CERTIFICATE	0 Year(s)
6600000026	SUN/1 CERTIFICATE	0 Year(s)
6600000027	QMIS DC APPROVER CERTIFICATE	0 Year(s)
6600000028	QMIS ONLINE ACCESS CERTIFICATE	0 Year(s)
6600000029	FIRST AID AND CPR CERTIFICATE	3 Year(s)
6600000030	ACS ADVANCED TRAINING CERT.	0 Year(s)
6600000031	RESPIRATOR TRAINING CERT.	0 Year(s)
6600000032	ADVANCED GC TRAINING CERT.	0 Year(s)
6600000033	BASIC GC TRAINING CERTIFICATE	0 Year(s)
6600000034	WORKING FOREMAN CERTIFICATE	0 Year(s)
6600000035	HAZARDOUS MATERIAL CERTIFICATE	0 Year(s)
6600000036	QUALITY POLICY TRAINING CERT.	0 Year(s)
6600000037	AUDIT SYSTEM CERTIFICATE	0 Year(s)
6600000038	WASHOUT PROCEDURE CERTIFICATE	0 Year(s)
6600000039	ACTION RESPONDENT CERTIFICATE	0 Year(s)
6600000040	ACTION APPROVER CERTIFICATE	0 Year(s)
6600000041	LAB CALIBRATION CERTIFICATE	0 Year(s)
6600000042	AUDIT OVERVIEW CERTIFICATE	0 Year(s)
6600000043	LAB REVIEW CERTIFICATE	0 Year(s)
6600000044	DATA COLOR COLOR CONTROL TECH	0 Year(s)
6600000045	AIR TRANSPORT SEMINAR	0 Year(s)
6600000046	LOCKOUT TAG OUT TRAINING	0 Year(s)
6600000047	HAZ MAT CERTIFICATE	0 Year(s)
6600000048	INVENTORY CONTROL CLERK CERT	0 Year(s)
6600000049	BASE DATA ENTRY CERTIFICATE	0 Year(s)
6600000050	QC PROGRAM TRAINED CERTIFICATE	0 Year(s)
6600000051	MAINTENANCE MODULE SUPERVISOR	0 Year(s)
6600000052	MAINTENANCE MODULE EMPLOYEE	0 Year(s)
6600000053	MAINTENANCE ADMIN CERTIFICATE	0 Year(s)
6600000054	2000 REVISIONS CERTIFICATE	0 Year(s)
6600000055	INK 101 CERTIFICATE	0 Year(s)
6600000056	MOSER PRINTING 101	0 Year(s)
6600000057	PLANT MANAGER CERTIFICATE	0 Year(s)

Number of Records: 57

Sun Chemical  
Kankakee Plant  
3200 Festival Drive  
Kankakee, IL 60901

22-May-2000  
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*Resource Inquiry Result*

<u>Employee No.</u>	<u>Name</u>	<u>Job Code</u>	<u>Location No.</u>	<u>Manager No.</u>	<u>Department No.</u>
<i>Resource Type: Certificate , Certificate No. : 6600000025</i>					
ADAMR	RODNEY ADAMS	6600000022	66	LAMIW	P
BLEID	DAMON BLEICH	6600000020	66	DONAC	S
BREWL	LARRY BREWSTER	6600000022	66	START	B
BREYB	BRADLEY BREYMEYER	6600000019	66	JOHNE	N
BURSV	VIOLA BURSE	6600000021	66	LAMIW	P
CARLG	GLEN CARLSON	6600000019	66	JOHNE	N
CARLN	NANETTE CARLSON	6600000028	66	MILJA	A
CARRJ	JESUS CARRANZA	6600000013	66	MILJA	Q
CARRR	RODNEY CARROLL	6600000015	66	MILJA	A
COTSR	ROBERT COTSONES	6600000020	66	DONAC	S
DELLK	KATHLEEN DELL	6600000011	66	WIDDG	O
DONAC	CARL DONALDSON	6600000007	66	KLECR	S
DOWNC	CHARLES DOWN	6600000018	66	JOHNE	N
GERTD	DONNA GERTSCH	6600000022	66	START	B
GRACD	DAVID GRACE	6600000021	66	PAPIJ	P
GRIZM	MICHAEL GRIZZLE	6600000028	66	MILJA	A
HARPJ	JIMMY HARPER	6600000022	66	PAPIJ	B
HEAGJ	JEFFERY HEAGLE	6600000022	66	LAMIW	B
HENSJ	JANICE HENSON	6600000013	66	MILJA	Q
JAMES	JOHN JAMES	6600000013	66	MILJA	Q
JOHNE	ERIC JOHNSON	6600000006	66	KLECR	N
KLECR	RONALD KLECAN	6600000003	66	MCBUJ	M
KOCHJ	JOHN KOCHER	6600000009	66	KLECR	P
KONIT	THOMAS KONITZ	6600000027	66	MILJA	A
KUPFR	CHARLES KUPFERER	6600000012	66	MILJA	Q
LAGED	DENNIS LAGESSE	6600000022	66	LAMIW	B
LAMIW	WAYNE LAMIE	6600000009	66	KLECR	P
LYNCD	DEBRA LYNCH	6600000013	66	MILJA	Q
MARTC	CHAD MARTELL	6600000021	66	START	P
MAYEW	WADE MAYER	6600000013	66	MILJA	Q
MCBUJ	JOHN MCBURROWS	6600000001	66	SUPERVISOR	M
MILJA	JACK MILLER	6600000005	66	MCBUJ	Q
MORRD	DANIEL MORRISON	6600000012	66	MILJA	Q
MYROJ	JOAN MYROUP	6600000013	66	MILJA	Q
NECKM	MICHAEL NECKOPULOS	6600000018	66	JOHNE	N
NICKR	RONALD NICKLES	6600000020	66	DONAC	S
OKEEO	ORA LEE O'KEEFE	6600000008	66	KLECR	P
PAPID	DOUGLAS PAPINEAU	6600000024	66	PAPIJ	P
PAPIJ	JOHN PAPINEAU	6600000009	66	KLECR	P
PATNJ	JERALD PATNAUDE	6600000023	66	LAMIW	P
PELEB	BRIAN PELEHOWSKI	6600000022	66	LAMIW	B
PFANS	SCOTT PFANTZ	6600000014	66	MILJA	Q
PIGUG	GERALD PIGUSCH	6600000022	66	PAPIJ	B
RAMIR	PEDRO RAMIREZ	6600000008	66	KLECR	O
REILB	BRIAN REILLY	6600000019	66	JOHNE	N

# Resource Inquiry Result

22-May-2000  
2 of

<u>Employee No.</u>	<u>Name</u>	<u>Job Code</u>	<u>Location No.</u>	<u>Manager No.</u>	<u>Department No.</u>
<u>Source Type: Certificate , Certificate No. : 6600000025</u>					
ROMAS	SUSAN ROMANO	6600000010	66	WIDDG	O
SELKD	DENNIS SELK	6600000020	66	DONAC	S
SMIMO	MONTY SMITH	6600000024	66	LAMIW	P
START	THOMAS STARK	6600000009	66	KLECR	P
SWARL	LARRY SWARTZ	6600000018	66	JOHNE	N
WALLR	RICKEY WALLACE	6600000022	66	START	B
WARCH	HELEN WARCHOL	6600000011	66	WIDDG	O
WASHG	GEORGE WASHINGTON	6600000021	66	PAPIJ	P
WIDDG	GEORGE WIDDOWSON	6600000004	66	MCBUJ	O
WOODR	ROGER WOOD	6600000024	66	PAPIJ	P
WRIGC	CARL WRIGHT	6600000022	66	PAPIJ	B

Number of Records : 56



SunChemical

Kankakee IL

## HAZARDOUS WASTE STORAGE INSPECTION

EPA I.D. NO. ILDO75603886

## DAILY HAZARDOUS WASTE STORAGE UNIT INSPECTION

1	ARE THERE ANY LEAKING DRUMS IN THE STORAGE UNIT: CIRCLE "YES" OR "NO" FROM SIDE BOX	<input checked="" type="radio"/> YES <input checked="" type="radio"/> NO	TOTAL SOLID WASTE DRUMS	6
2	ARE ALL DRUMS LABELED: CIRCLE "YES" OR "NO" FROM SIDE BOX	<input checked="" type="radio"/> YES <input checked="" type="radio"/> NO	TOTAL LIQUID WASTE DRUMS	17
3	ARE WARNING SIGNS POSTED: CIRCLE "YES" OR "NO" FROM SIDE BOX	<input checked="" type="radio"/> YES <input checked="" type="radio"/> NO	TOTAL NUMBER OF DRUMS	23

NAME OF INSPECTOR	BOB COTSONES	DATE	5/19/00	TIME	2:30 PM
REMEDIAL ACTION TAKEN					
ACTION TAKEN BY		DATE		TIME	

NOTE: DEFICIENCIES IN ITEMS 1; 2; AND 3 MUST BE CORRECTED IMMEDIATELY AND COMMENTS MADE IN THE "REMEDIAL ACTION TAKEN" SPACE PROVIDED.

## DAILY HAZARDOUS WASTE STORAGE AREA SAFETY EQUIPMENT INSPECTION LIST

## FIRE EXTINGUISHERS

DATE OF LAST REFILL OR SERVICE	5/2/00	EXTINGUISHER TYPE	DRY CHEMICAL
IS SEAL BROKEN: CIRCLE "YES" OR "NO" FROM SIDE BOX.	<input checked="" type="radio"/> YES <input checked="" type="radio"/> NO	PRESSURE INDICATION	2100 PSIG
IS EXTINGUISHER MOUNTED IN PROPER LOCATION: CIRCLE "YES" OR "NO" FROM SIDE BOX	<input checked="" type="radio"/> YES <input checked="" type="radio"/> NO	CONDITION OF EXTINGUISHER	GOOD FAIR

## SPILL CLEAN UP MATERIALS

ABSORBENT ON HAND: 50 BAGS TO BE ON HAND AT ALL TIMES.	NUMBER OF BAGS	80 BAGS			
IS ABSORBENT AND SPILL HANDLING EQUIPMENT ( SCOOPS AND RAKES ) PROPERLY STORED IN THE GARAGE AND READY FOR USE: CIRCLE "YES" OR "NO" FROM SIDE BOX	<input checked="" type="radio"/> YES <input checked="" type="radio"/> NO				
NAME OF INSPECTOR	BOB COTSONES	DATE	5/19/00	TIME	2:30 PM
REMEDIAL ACTION TAKEN					
REMEDIAL ACTION TAKEN BY		DATE		TIME	

NOTE: DEFICIENCIES IN ANY OF THE AREAS LISTED ABOVE MUST BE CORRECTED IMMEDIATELY AND COMMENTS MADE IN THE "REMEDIAL ACTION" SPACE PROVIDED.

THE FOLLOWING TANKS/TANK TRUCKS/TANKERS WERE FOUND LEAKING	None						
RAINWATER WAS PUMPED FROM THE FOLLOWING CONTAINMENT AREAS:							
SOLVENT TANKS	<input checked="" type="checkbox"/>	VARNISH TANKS	<input checked="" type="checkbox"/>	TRUCK LOAD	<input checked="" type="checkbox"/>	HAZ. WASTE	<input checked="" type="checkbox"/>

Example  
Weekly  
Inspection  
Report



<b>A. General Information</b> Generator Name: <u>Seen Chemical</u>		Company Name: <u>J</u>	
Facility Address: <u>1300 Festival Dr.</u>		Address: <u>AME</u>	
Mailing Address: <u>Kankakee, IL 60901</u>		City, State, Zip:	
Generator USEPA I.D.: <u>FILID101715161013181816</u>		Phone #: _____ Purchase Order #: _____	
Technical Contact: <u>Eric Johnson</u>		Name of Waste: <u>Wash Water</u>	
Phone #: <u>815 939 0136</u> Fax #: _____		Process Generating Waste: <u>Floor scrubbing</u>	

<b>C. Physical Characteristics of Waste</b>					
Color: <u>BLACK</u>	Order: <input type="checkbox"/> None <input checked="" type="checkbox"/> Mild <input type="checkbox"/> Strong Describe: _____	Physical State at 70°F <input type="checkbox"/> Strong <input type="checkbox"/> Sludge <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> _____	Layers: <input type="checkbox"/> Multilayered <input type="checkbox"/> Bi-Layered <input checked="" type="checkbox"/> Single Phased	Free Liquids: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Volume _____ %	Viscosity: <input checked="" type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High
pH: <input type="checkbox"/> ≤ 2.0 <input checked="" type="checkbox"/> 2.1 - 12.4 <input type="checkbox"/> ≥ 12.5	Heat Content: _____ BTU/gal _____ BTU/lb	Weight: _____ Lbs/Gal Specific Gravity: _____	Flash Point °F <input type="checkbox"/> < 100° <input type="checkbox"/> 140°-200° <input type="checkbox"/> 100°-140° <input checked="" type="checkbox"/> > 200°	Halogens: _____ % Weight	

<b>D. Chemical Composition (Totals must add up to 100%)</b>				<b>E. Metals</b>			
Water Content		<u>70-95</u>		Total (PPM)		TCLP (PPM)	
<u>DIRT</u>		<u>1-5</u>		Arsenic	<u>N/A</u>	Selenium	<u>N/A</u>
<u>INK</u>		<u>1-5</u>		Barium		Silver	
				Cadmium		Copper	
				Chromium		Nickel	
				Mercury		Zinc	
				Lead			
TOTAL		100 %		<b>F. Other Components - Total (PPM)</b>			
				Cyanides:	<u>N/A</u>	PCB's	<u>N/A</u>
				Sulfides:	<u>N/A</u>		

<b>Shipping Information</b>				<b>H. Hazardous Characteristics</b>			
DOT Hazardous Material? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No ( <u>WASH WATER</u> )				Reactivity: <input checked="" type="checkbox"/> None <input type="checkbox"/> Pyrophoric <input type="checkbox"/> Shock Sensitive			
Proper Shipping Name: <u>NON-HAZARDOUS SPECIAL WASTE</u>				<input type="checkbox"/> Explosive <input type="checkbox"/> Water Reactive <input type="checkbox"/> Other			
DOT Hazard Class: <u>N/A</u> PG _____				Other Hazardous Characteristics:			
ID No. UN/NA _____ RQ _____				<input checked="" type="checkbox"/> None <input type="checkbox"/> Radioactive <input type="checkbox"/> Etiological			
Method of Shipment: <input checked="" type="checkbox"/> Bulk Liquid				<input type="checkbox"/> Pesticide Mfg Waste			
<input type="checkbox"/> Drum (typesize) _____				Is this a hazardous waste as defined by 40 CFR 261.4?			
<input type="checkbox"/> Other _____				<input type="checkbox"/> Yes <input type="checkbox"/> No			
Anticipated Volume: <u>3500</u> <u>Gals</u> Other ( ) _____				USEPA hazardous codes: <u>N/A</u>			
Per: <input type="checkbox"/> One Time <input type="checkbox"/> Week <input type="checkbox"/> Month				Is this waste subject to a Land Disposal Restriction per 40 CFR 268?			
<input checked="" type="checkbox"/> Quarter <input type="checkbox"/> Annual <input type="checkbox"/> _____				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, attach Land Ban Form.			

<b>I. Special Handling Information/Additional Comments</b>	

<b>J. Certification</b>		
I hereby warrant the sample defined herein is truly representative of all physical and chemical properties of the waste stream as defined in the preceding profile data, and taken in accordance with 40 CFR 261. I have reviewed and am familiar with the information supplied in this and all attached documents and that to the best of my knowledge is true and accurate, and all suspected hazards have been disclosed. Correction Authorization: I authorize Environmental Services of America and/or its representative(s) to make corrections to this profile which are consistent with the sample presented for characterization and/or regulatory requirements of state and federal agencies. I understand that I will receive a corrected copy.		
Generator Signature: <u>Eric Johnson</u>	Title: _____	Date: <u>11/29/99</u>

Waste Analysis

Generator Name: <u>Seon Chemical</u>		Company Name:	
Facility Address: <u>1300 Festival Dr.</u>		Address: <u>5 A ME</u>	
Mailing Address: <u>Kankakee, IL 60901</u>		City, State, Zip:	
		Contact:	
Generator USEPA I.D. <u>FL1D101715161013181816</u>		Phone #:	Purchase Order #:
Technical Contact: <u>Eric Johnson</u>		Name of Waste: <u>Ink + Solvent</u>	
Phone #: <u>815 939 0136</u>	Fax #:	Process Generating Waste: <u>Cleaning mills or tote bins</u>	

### C. Physical Characteristics of Waste

Color: <u>Black</u>	Order: <input type="checkbox"/> None <input type="checkbox"/> Mild <input type="checkbox"/> Strong Describe: _____	Physical State at 70°F: <input type="checkbox"/> Strong <input checked="" type="checkbox"/> Sludge <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> _____	Layers: <input type="checkbox"/> Multilayered <input type="checkbox"/> Bi-Layered <input type="checkbox"/> Single Phased	Free Liquids: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Volume <u>80</u> %	Viscosity: <input type="checkbox"/> Low <input checked="" type="checkbox"/> Medium <input type="checkbox"/> High
pH: <input type="checkbox"/> ≤ 2.0 <input type="checkbox"/> 2.1 - 12.4 <input type="checkbox"/> ≥ 12.5	Heat Content: _____ BTU/gal _____ BTU/lb <u>10-15,000</u>	Weight: _____ Lbs/Gal Specific Gravity _____	Flash Point °F: <input checked="" type="checkbox"/> < 100° <input type="checkbox"/> 140°-200° <input checked="" type="checkbox"/> 100°-140° <input type="checkbox"/> >200°	Halogens: _____ % Weight	

### D. Chemical Composition (Totals must add up to 100%)

Water Content	
<u>SOLVENT (TOLUENE)</u>	<u>60-90</u>
<u>INK</u>	<u>3-20</u>
TOTAL	100 %

### E. Metals

Total (PPM)	TCLP (PPM)
Arsenic <u>N/A</u>	Selenium <u>N/A</u>
Barium <u>N/A</u>	Silver <u>N/A</u>
Cadmium <u>N/A</u>	Copper <u>N/A</u>
Chromium <u>N/A</u>	Nickel <u>N/A</u>
Mercury <u>N/A</u>	Zinc <u>N/A</u>
Lead <u>N/A</u>	

### F. Other Components - Total (PPM)

Cyanides: <u>N/A</u>	PCB's: <u>N/A</u>	Sulfides: <u>N/A</u>
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### G. Shipping Information

DOT Hazardous Material? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Proper Shipping Name: <u>HAZ WASTE FLAMMABLE LIQUID, N.O.S. (TOLUENE), 3</u>
DOT Hazard Class: <u>FLAMMABLE</u> PG <u>II</u>	ID No. <u>UN193</u> RQ _____
Method of Shipment: <input checked="" type="checkbox"/> Bulk Liquid <input type="checkbox"/> Drum (typesize) _____ <input type="checkbox"/> Other _____	Anticipated Volume: <u>4500 gal</u> Gals _____ Other ( ) _____
Per: <input checked="" type="checkbox"/> One Time <input type="checkbox"/> Week <input type="checkbox"/> Month <input checked="" type="checkbox"/> Quarter <input type="checkbox"/> Annual <input type="checkbox"/> _____	

### H. Hazardous Characteristics

Reactivity: <input checked="" type="checkbox"/> None <input type="checkbox"/> Pyrophoric <input type="checkbox"/> Shock Sensitive <input type="checkbox"/> Explosive <input type="checkbox"/> Water Reactive <input type="checkbox"/> Other _____
Other Hazardous Characteristics: <input checked="" type="checkbox"/> None <input type="checkbox"/> Radioactive <input type="checkbox"/> Etiological <input type="checkbox"/> Pesticide Mfg Waste
Is this a hazardous waste as defined by 40 CFR 261.4? <input type="checkbox"/> Yes <input type="checkbox"/> No
USEPA hazardous codes: <u>F005 D001</u>
Is this waste subject to a Land Disposal Restriction per 40 CFR 268? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, attach Land Ban Form.

### I. Special Handling Information/Additional Comments


### J. Certification

I hereby warrant the sample defined herein is truly representative of all physical and chemical properties of the waste stream as defined in the preceding profile data, and taken in accordance with 40 CFR 261. I have reviewed and am familiar with the information supplied in this and all attached documents and that to the best of my knowledge is true and accurate, and all suspected hazards have been disclosed. Correction Authorization: I authorize Environmental Services of America and/or its representative(s) to make corrections to this profile which are consistent with the sample presented for characterization and/or regulatory requirements of state and federal agencies. I understand that I will receive a corrected copy.		
Generator Signature: <u>[Signature]</u>	Title: _____	Date: <u>11/29/99</u>

A. General Information:	
Generator Name: <i>Am Chemical</i>	Company Name: <i>S</i>
Facility Address: <i>1300 Festival Dr.</i>	Address: <i>A</i>
Mailing Address: <i>Yankakee, IL 60901</i>	City, State, Zip: <i>3 E</i>
Generator USEPA I.D. <i>71LID101715161013181816</i>	Phone #: <i>815 939 0136</i>
Technical Contact: <i>Eric Johnson</i>	Name of Waste: <i>Pigments</i>
Process Generating Waste: <i>Broken bags may contain some oil-dry or other absorbent mat</i>	

C. Physical Characteristics of Waste			
Color: <i>VARIES</i>	Order: <input type="checkbox"/> None <input checked="" type="checkbox"/> Mild <input type="checkbox"/> Strong Describe: _____	Physical State at 70°F <input type="checkbox"/> Strong <input type="checkbox"/> Sludge <i>POWDER</i> <input type="checkbox"/> Liquid <input checked="" type="checkbox"/> SOLID	Layers: <input type="checkbox"/> Multilayered <input type="checkbox"/> Bi-Layered <input checked="" type="checkbox"/> Single Phased
pH: <input type="checkbox"/> < 2.0 <input checked="" type="checkbox"/> 2.1 - 12.4 <input type="checkbox"/> > 12.5	Heat Content: ____ BTU/gal ____ BTU/Lb	Weight: ____ Lbs/Gal Specific Gravity: _____	Free Liquids: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Volume _____ %
Viscosity: <input type="checkbox"/> Low <input type="checkbox"/> Medium <input checked="" type="checkbox"/> High		Flash Point °F <input type="checkbox"/> < 100° <input type="checkbox"/> 140°-200° <input type="checkbox"/> 100°-140° <input type="checkbox"/> > 200°	
Halogens: ____ % Weight			

D. Chemical Composition (Totals must add up to 100%)		E. Metals Total (PPM)		TCLP (PPM)	
Water Content		Arsenic	<i>N/A</i>	Selenium	<i>N/A</i>
<i>PIGMENT</i>		Barium	<i>N/A</i>	Silver	<i>N/A</i>
<i>MSDS ATTACHED</i>		Cadmium	<i>N/A</i>	Copper	<i>N/A</i>
<i>100</i>		Chromium	<i>N/A</i>	Nickel	<i>N/A</i>
		Mercury	<i>N/A</i>	Zinc	<i>N/A</i>
		Lead	<i>N/A</i>		
TOTAL		100 %			

Shipping Information		H. Hazardous Characteristics	
DOT Hazardous Material? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>(PIGMENTS)</i>	Proper Shipping Name: <i>NON-HAZARDOUS SPECIAL WASTE</i>	Reactivity: <input checked="" type="checkbox"/> None <input type="checkbox"/> Pyrophoric <input type="checkbox"/> Shock Sensitive <input type="checkbox"/> Explosive <input type="checkbox"/> Water Reactive <input type="checkbox"/> Other	Other Hazardous Characteristics: <input checked="" type="checkbox"/> None <input type="checkbox"/> Radioactive <input type="checkbox"/> Etiological <input type="checkbox"/> Pesticide Mfg Waste
DOT Hazard Class: PG _____ RQ _____	Method of Shipment: <input type="checkbox"/> Bulk Liquid <input checked="" type="checkbox"/> Drum (typesize) <i>55 g</i> <input type="checkbox"/> Other _____	Is this a hazardous waste as defined by 40 CFR 261.47? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	USEPA hazardous codes: <i>N/A</i>
Anticipated Volume: <i>2 DRUMS</i> Gals _____ Other ( ) _____	Per: <input type="checkbox"/> One Time <input type="checkbox"/> Week <input type="checkbox"/> Month <input checked="" type="checkbox"/> Quarter <input type="checkbox"/> Annual <input type="checkbox"/> _____	Is this waste subject to a Land Disposal Restriction per 40 CFR 268? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, attach Land Ban Form.	

I. Special Handling Information/Additional Comments

J. Certification	
I hereby warrant the sample defined herein is truly representative of all physical and chemical properties of the waste stream as defined in the preceding profile data, and taken in accordance with 40 CFR 261. I have reviewed and am familiar with the information supplied in this and all attached documents and that to the best of my knowledge is true and accurate, and all suspected hazards have been disclosed. Correction Authorization: I authorize Environmental Services of America and/or its representative(s) to make corrections to this profile which are consistent with the sample presented for characterization and/or regulatory requirements of state and federal agencies. I understand that I will receive a corrected copy.	
Generator Signature: <i>Eric Johnson</i>	Title: _____ Date: <i>11/29/99</i>

Company Name: <b>SUN CHEMICAL</b>		Address: <b>SAME</b>	
Facility Address: <b>135 W. LAKE ST.</b>		City, State, Zip: <b>NORTHLAKE, IL 60164</b>	
Mailing Address: <b>NORTHLAKE, IL 60164</b>		Contact:	
Generator USEPA I.D. <b>IL1D10151/101913131617</b>		Phone #: <b>708 562-0550</b>	Purchase Order #:
Technical Contact: <b>DANNY MORGAN</b>		Name of Waste: <b>UV INK</b>	
Fax #: <b>708 562 0576</b>		Process Generating Waste: <b>TANK WASH OUT &amp; LEFTOVER UNUSED INK</b>	

C. Physical Characteristics of Waste					
Color: <b>VARIES</b>	Order: <input type="checkbox"/> None <input checked="" type="checkbox"/> Mild Describe: _____	Physical State at 70°F: <input type="checkbox"/> Strong <input type="checkbox"/> Sludge <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> _____	Layers: <input type="checkbox"/> Multilayered <input type="checkbox"/> Bi-Layered <input checked="" type="checkbox"/> Single Phased	Free Liquids: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Volume _____ %	Viscosity: <input checked="" type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High
pH: <input type="checkbox"/> ≤ 2.0 <input checked="" type="checkbox"/> 2.1 - 12.4 <input type="checkbox"/> ≥ 12.5	Heat Content: _____ BTU/gal <b>10-15,000</b> BTU/Lb	Weight: _____ Lbs/Gal Specific Gravity: _____	Flash Point °F: <input type="checkbox"/> < 100° <input checked="" type="checkbox"/> 100°-140° <input type="checkbox"/> > 200°	Halogens: _____ % Weight	

D. Chemical Composition (Totals must add up to 100%)		E. Metals Total (PPM)		F. Other Components - Total (PPM)																																			
<table border="1" style="width:100%; border-collapse: collapse;"> <tr><th colspan="2">Water Content</th></tr> <tr><td><b>RESIN</b></td><td><b>30-40</b></td></tr> <tr><td><b>MER</b></td><td><b>20-50</b></td></tr> <tr><td><b>TOLUENE</b></td><td><b>5-25</b></td></tr> <tr><td><b>XYLENE</b></td><td><b>5-25</b></td></tr> <tr><td colspan="2">TOTAL _____ 100 %</td></tr> </table>		Water Content		<b>RESIN</b>	<b>30-40</b>	<b>MER</b>	<b>20-50</b>	<b>TOLUENE</b>	<b>5-25</b>	<b>XYLENE</b>	<b>5-25</b>	TOTAL _____ 100 %		<table border="1" style="width:100%; border-collapse: collapse;"> <tr><td>Arsenic</td><td><b>N/A</b></td></tr> <tr><td>Barium</td><td><b>N/A</b></td></tr> <tr><td>Cadmium</td><td><b>N/A</b></td></tr> <tr><td>Chromium</td><td><b>N/A</b></td></tr> <tr><td>Mercury</td><td><b>N/A</b></td></tr> <tr><td>Lead</td><td><b>N/A</b></td></tr> </table>		Arsenic	<b>N/A</b>	Barium	<b>N/A</b>	Cadmium	<b>N/A</b>	Chromium	<b>N/A</b>	Mercury	<b>N/A</b>	Lead	<b>N/A</b>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr><td>Selenium</td><td><b>N/A</b></td></tr> <tr><td>Silver</td><td><b>N/A</b></td></tr> <tr><td>Copper</td><td><b>N/A</b></td></tr> <tr><td>Nickel</td><td><b>N/A</b></td></tr> <tr><td>Zinc</td><td><b>N/A</b></td></tr> </table>		Selenium	<b>N/A</b>	Silver	<b>N/A</b>	Copper	<b>N/A</b>	Nickel	<b>N/A</b>	Zinc	<b>N/A</b>
Water Content																																							
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Copper	<b>N/A</b>																																						
Nickel	<b>N/A</b>																																						
Zinc	<b>N/A</b>																																						
Cyanides: <b>N/A</b>		PCB's: <b>N/A</b>		Sulfides: <b>N/A</b>																																			

G. Shipping Information		H. Hazardous Characteristics	
Hazardous Material? <input type="checkbox"/> Yes <input type="checkbox"/> No Proper Shipping Name: <b>WASTE, Flammable LIQUID, N.O.S. (METHYL ETHYL KETONE)</b> DOT Hazard Class: <b>PG III</b> ID No. <b>1993</b> Method of Shipment: <input type="checkbox"/> Bulk Liquid <input checked="" type="checkbox"/> Drum (typesize) <b>55 g.</b> <input type="checkbox"/> Other _____ Anticipated Volume: <b>60-80 DRUMS</b> Gals Other ( ) _____ Per: <input type="checkbox"/> One Time <input type="checkbox"/> Week <input checked="" type="checkbox"/> Month <input type="checkbox"/> Quarter <input type="checkbox"/> Annual <input type="checkbox"/> _____		Reactivity: <input checked="" type="checkbox"/> None <input type="checkbox"/> Pyrophoric <input type="checkbox"/> Shock Sensitive <input type="checkbox"/> Explosive <input type="checkbox"/> Water Reactive <input type="checkbox"/> Other _____ Other Hazardous Characteristics: <input checked="" type="checkbox"/> None <input type="checkbox"/> Radioactive <input type="checkbox"/> Etiological <input type="checkbox"/> Pesticide Mfg Waste Is this a hazardous waste as defined by 40 CFR 261.4? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No USEPA hazardous codes: <b>D001 D035 F005 F003</b> Is this waste subject to a Land Disposal Restriction per 40 CFR 268? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, attach Land Ban Form.	

I. Special Handling Information/Additional Comments

J. Certification		
I hereby warrant the sample defined herein is truly representative of all physical and chemical properties of the waste stream as defined in the preceding profile data, and taken in accordance with 40 CFR 261. I have reviewed and am familiar with the information supplied in this and all attached documents and that to the best of my knowledge is true and accurate, and all suspected hazards have been disclosed. Correction Authorization: I authorize Environmental Services of America and/or its representative(s) to make corrections to this profile which are consistent with the sample presented for characterization and/or regulatory requirements of state and federal agencies. I understand that I will receive a corrected copy.		
Generator Signature: <b>Danny Morgan</b>	Title: <b>Superior</b>	Date: <b>11/29/99</b>

<b>SUN CHEMICAL</b> Facility Address: <b>135 W. LAKE ST.</b> Mailing Address: <b>NORTHLAKE, IL. 60164</b>		Company Name: <b>J AME</b> Address:  City, State, Zip:  Contact:  Phone #:  Purchase Order #: 	
Generator USEPA ID: <b>IL1D101511101913131617</b>		Name of Waste: <b>PASTE INK</b>	
Technical Contact: <b>DANNY MORGAN</b> Phone #: <b>708-562-0550</b>		Fax #: <b>708-562-0576</b>	
Process Generating Waste: <b>LEFTOVER UNUSED</b>			
<b>C. Physical Characteristics of Waste</b>			
Color: <b>VARIES</b>	Order: <input type="checkbox"/> None <input checked="" type="checkbox"/> Mild <input type="checkbox"/> Strong Describe: _____	Physical State at 70°F <input type="checkbox"/> Strong <input checked="" type="checkbox"/> Sludge <input type="checkbox"/> Liquid <input type="checkbox"/> _____	Layers: <input type="checkbox"/> Multilayered <input type="checkbox"/> Bi-Layered <input checked="" type="checkbox"/> Single Phased
pH: <input type="checkbox"/> ≤ 2.0 <input checked="" type="checkbox"/> 2.1 - 12.4 <input type="checkbox"/> ≥ 12.5	Heat Content: _____ BTU/gal <b>10-15000</b> BTU/Lb	Weight: _____ Lbs/Gal Specific Gravity: _____	Free Liquids: <input type="checkbox"/> Yes <input type="checkbox"/> No Volume _____ % Viscosity: <input type="checkbox"/> Low <input type="checkbox"/> Medium <input checked="" type="checkbox"/> High
Flash Point °F <input checked="" type="checkbox"/> < 100° <input type="checkbox"/> 140°-200° <input checked="" type="checkbox"/> 100°-140° <input type="checkbox"/> > 200°		Halogens: _____ % Weight	
<b>D. Chemical Composition (Totals must add up to 100%)</b>			
Water Content <b>PIGMENT</b> _____ <b>RESINS</b> _____ <b>TOLUENE</b> _____ <b>ISOPROPANOL</b> _____ TOTAL _____		_____ _____ _____ _____ 100 %	
<b>E. Metals Total (PPM)</b>			
Arsenic <b>N/A</b> Barium <b>N/A</b> Cadmium <b>N/A</b> Chromium <b>N/A</b> Mercury <b>N/A</b> Lead <b>N/A</b>		Selenium <b>N/A</b> Silver _____ Copper _____ Nickel _____ Zinc _____	
<b>F. Other Components - Total (PPM)</b>			
Cyanides: <b>0</b>		PCB's: <b>0</b>	
Sulfides: <b>0</b>			
<b>G. Shipping Information</b>			
DOT Hazardous Material? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Proper Shipping Name: <b>RG - WASTE FLAMMABLE LIQUID, N.O.S.</b>			
DOT Hazard Class: <b>(TOLUENE/ISOPROPANOL) II</b>			
ID No. <b>UNNA</b> <b>1993</b> RQ _____			
Method of Shipment <input type="checkbox"/> Bulk Liquid <input checked="" type="checkbox"/> Drum (typesize) <b>35g.</b> <input type="checkbox"/> Other _____			
Anticipated Volume: <b>1/2 TRUCK 40-50 DRUMS</b>			
Per: <input type="checkbox"/> One Time <input type="checkbox"/> Week <input checked="" type="checkbox"/> Month <input type="checkbox"/> Quarter <input type="checkbox"/> Annual <input type="checkbox"/> _____			
<b>H. Hazardous Characteristics</b>			
Reactivity: <input checked="" type="checkbox"/> None <input type="checkbox"/> Pyrophoric <input type="checkbox"/> Shock Sensitive <input type="checkbox"/> Explosive <input type="checkbox"/> Water Reactive <input type="checkbox"/> Other			
Other Hazardous Characteristics: <input checked="" type="checkbox"/> None <input type="checkbox"/> Radioactive <input type="checkbox"/> Etiological <input type="checkbox"/> Pesticide Mfg Waste			
Is this a hazardous waste as defined by 40 CFR 261.4? <input type="checkbox"/> Yes <input type="checkbox"/> No			
USEPA hazardous codes: <b>F005 D001</b>			
Is this waste subject to a Land Disposal Restriction per 40 CFR 268? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, attach Land Ban Form.			
<b>I. Special Handling Information/Additional Comments</b>			
<b>J. Certification</b>			
I hereby warrant the sample defined herein is truly representative of all physical and chemical properties of the waste stream as defined in the preceding profile data, and taken in accordance with 40 CFR 261. I have reviewed and am familiar with the information supplied in this and all attached documents and that to the best of my knowledge is true and accurate, and all suspected hazards have been disclosed. Correction Authorization: I authorize Environmental Services of America and/or its representative(s) to make corrections to this profile which are consistent with the sample presented for characterization and/or regulatory requirements of state and federal agencies. I understand that I will receive a corrected copy.			
Generator Signature: <b>Danny Morgan</b>		Title: <b>Supervisor</b>	
		Date: <b>11/29/99</b>	

Generator Name: <b>SUN CHEMICAL</b>		Company Name: <b>SAME</b>	
Facility Address: <b>135 W. LAKE ST.</b>		Address: <b>SAME</b>	
Mailing Address: <b>NORTHLAKE, IL 60064</b>		City, State, Zip: <b>SAME</b>	
Generator USEPA I.D. <b>ILID10151101913131617</b>		Phone #:	Purchase Order #:
Technical Contact: <b>DANNY MORGAN</b>		Name of Waste: <b>INK &amp; FILTER BAGS</b>	
Phone #: <b>7085620550</b>	Fax #: <b>708-562-0576</b>	Process Generating Waste: <b>FILTERING INK</b>	

C. Physical Characteristics of Waste					
Color: <b>VARIES</b>	Order: <input type="checkbox"/> None <input checked="" type="checkbox"/> Mild <input checked="" type="checkbox"/> Strong Describe: _____	Physical State at 70°F <input type="checkbox"/> Strong <input checked="" type="checkbox"/> Sludge <input type="checkbox"/> Liquid <input checked="" type="checkbox"/> SOLID	Layers: <input type="checkbox"/> Multilayered <input type="checkbox"/> Bi-Layered <input checked="" type="checkbox"/> Single Phased	Free Liquids: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Volume <b>1-15</b> %	Viscosity: <input type="checkbox"/> Low <input type="checkbox"/> Medium <input checked="" type="checkbox"/> High
pH: <input type="checkbox"/> ≤ 2.0 <input checked="" type="checkbox"/> 2.1 - 12.4 <input type="checkbox"/> ≥ 12.5	Heat Content: ____ BTU/gal <b>10-15,000</b> BTU/lb	Weight: ____ Lbs/Gal Specific Gravity: _____	Flash Point °F <input checked="" type="checkbox"/> < 100° <input type="checkbox"/> 140°-200° <input checked="" type="checkbox"/> 100°-140° <input type="checkbox"/> >200°	Halogens: ____ % Weight	

D. Chemical Composition (Totals must add up to 100%)		E. Metals Total (PPM)		F. Other Components - Total (PPM)	
Water Content		Arsenic	Selenium	Cyanides:	PCB's
<b>FILTER BAGS</b>	<b>50-70</b>	Barium	Silver	<b>N/A</b>	<b>N/A</b>
<b>INK</b>	<b>30-50</b>	Cadmium	Copper	<b>N/A</b>	<b>N/A</b>
<b>METAL RINGS</b>	<b>1-5</b>	Chromium	Nickel	<b>N/A</b>	<b>N/A</b>
____	____	Mercury	Zinc	<b>N/A</b>	<b>N/A</b>
____	____	Lead	____	<b>N/A</b>	<b>N/A</b>
TOTAL	100 %				

Shipping Information		H. Hazardous Characteristics	
DOT Hazardous Material? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Proper Shipping Name: <b>WASTE FLAMMABLE LIQUID N.O.S. (ALCOHOL)</b>	Reactivity: <input checked="" type="checkbox"/> None <input type="checkbox"/> Pyrophoric <input type="checkbox"/> Shock Sensitive	<input type="checkbox"/> Explosive <input type="checkbox"/> Water Reactive <input type="checkbox"/> Other
DOT Hazard Class: <b>FLAMMABLE</b>	PG <b>III</b>	Other Hazardous Characteristics: <input checked="" type="checkbox"/> None <input type="checkbox"/> Radioactive <input type="checkbox"/> Etiological <input type="checkbox"/> Pesticide Mfg Waste	
ID No: <b>UN/NA</b>	RQ _____	Is this a hazardous waste as defined by 40 CFR 261.47? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Method of Shipment: <input type="checkbox"/> Bulk Liquid <input checked="" type="checkbox"/> Drum (type/size) <b>55 g.</b> <input type="checkbox"/> Other _____	Anticipated Volume: <b>1/2 TRUCK</b> Gals <b>40-50 drums</b> Other ( ) _____	USEPA hazardous codes: <b>D001</b>	
Per: <input type="checkbox"/> One Time <input type="checkbox"/> Week <input checked="" type="checkbox"/> Month <input type="checkbox"/> Quarter <input type="checkbox"/> Annual		Is this waste subject to a Land Disposal Restriction per 40 CFR 265? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, attach Land Ban Form.	

I. Special Handling Information/Additional Comments	

J. Certification	
I hereby warrant the sample defined herein is truly representative of all physical and chemical properties of the waste stream as defined in the preceding profile data, and taken in accordance with 40 CFR 261. I have reviewed and am familiar with the information supplied in this and all attached documents and that to the best of my knowledge is true and accurate, and all suspected hazards have been disclosed. Correction Authorization: I authorize Environmental Services of America and/or its representative(s) to make corrections to this profile which are consistent with the sample presented for characterization and/or regulatory requirements of state and federal agencies. I understand that I will receive a corrected copy.	
Generator Signature: <b>DANNY MORGAN</b>	Title: <b>SUPERVISOR</b> Date: <b>11/29/99</b>



## A. General Information

Generator Name:

Jern Chemical

Facility Address:

1300 Festival Dr.

Mailing Address:

Kankakee, IL 60901

Generator USEPA I.D.

F1L1D101715161013181816

Technical Contact:

Eric Johnson

Phone #:

815 939 0136

Fax #:

## B. Bill To

Company Name:

Address:

City, State, Zip:

Contact:

Phone #:

Purchase Order #:

Name of Waste:

Ink Needs

Process Generating Waste:

Batch ends. Leftover unused material

## C. Physical Characteristics of Waste

Color: VARIES	Order: <input type="checkbox"/> None <input checked="" type="checkbox"/> Mild <input type="checkbox"/> Strong Describe: _____	Physical State at 70°F <input type="checkbox"/> Strong <input checked="" type="checkbox"/> Sludge <input type="checkbox"/> Liquid <input type="checkbox"/> _____	Layers: <input type="checkbox"/> Multilayered <input type="checkbox"/> Bi-Layered <input checked="" type="checkbox"/> Single Phased	Free Liquids: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Volume 0-10 %	Viscosity: <input type="checkbox"/> Low <input type="checkbox"/> Medium <input checked="" type="checkbox"/> High
pH: <input type="checkbox"/> ≤ 2.0 <input type="checkbox"/> 2.1 - 12.4 <input type="checkbox"/> ≥ 12.5	Heat Content: ____ BTU/gal 10-15,000 BTU/Lb	Weight: ____ Lbs/Gal Specific Gravity _____	Flash Point °F <input type="checkbox"/> < 100° <input type="checkbox"/> 140°-200° <input type="checkbox"/> 100°-140° <input type="checkbox"/> > 200°	Halogens: ____ % Weight	

## D. Chemical Composition (Totals must add up to 100%)

Water Content	
INK	1-5
(TOLUENE)	60-80
(PIGMENTS)	10-20
(RESINS)	1-15
TOTAL	100 %

## E. Metals

Total (PPM)	TCLP (PPM)
Arsenic	N/A
Barium	N/A
Cadmium	N/A
Chromium	N/A
Mercury	N/A
Lead	N/A
Selenium	N/A
Silver	N/A
Copper	N/A
Nickel	N/A
Zinc	N/A

## F. Other Components - Total (PPM)

Cyanides: N/A	PCB's: N/A	Sulfides: N/A
---------------	------------	---------------

## G. Shipping Information

DOT Hazardous Material? ☒ Yes ☐ No

Proper Shipping Name: HAZARDOUS WASTE PRINTING INK, FLAMMABLE, 3

DOT Hazard Class: PG III

ID No. (UN/NA) 1210

Method of Shipment: ☐ Bulk Liquid ☒ Drum (typesize) 55g ☐ Other \_\_\_\_\_

Anticipated Volume: 20 drums Gals Other ( ) \_\_\_\_\_

Per: ☐ One Time ☐ Week ☐ Month ☒ Quarter ☐ Annual ☐ \_\_\_\_\_

## H. Hazardous Characteristics

Reactivity: ☒ None ☐ Pyrophoric ☐ Shock Sensitive  
☐ Explosive ☐ Water Reactive ☐ Other \_\_\_\_\_

Other Hazardous Characteristics:  
☒ None ☐ Radioactive ☐ Etiological  
☐ Pesticide Mfg Waste

Is this a hazardous waste as defined by 40 CFR 261.4?  
☐ Yes ☐ No

USEPA hazardous codes: D001 D008 F005

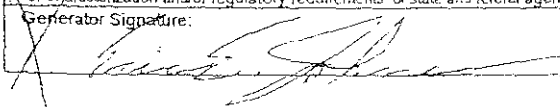
Is this waste subject to a Land Disposal Restriction per 40 CFR 268?  
☒ Yes ☐ No If Yes, attach Land Ban Form.

## I. Special Handling Information/Additional Comments

## J. Certification

I hereby warrant the sample defined herein is truly representative of all physical and chemical properties of the waste stream as defined in the preceding profile data, and taken in accordance with 40 CFR 261. I have reviewed and am familiar with the information supplied in this and all attached documents and that to the best of my knowledge is true and accurate, and all suspected hazards have been disclosed. Correction Authorization: I authorize Environmental Services of America and/or its representative(s) to make corrections to this profile which are consistent with the sample presented for characterization and/or regulatory requirements of state and federal agencies. I understand that I will receive a corrected copy.

Generator Signature:



Title:

Date:

11/25/99

SUN CHEMICAL CORP  
3200 FESTIVAL DR  
KANKAKEE

IL  
60901

Instructions for this form found on pages  
this form must be completed for the local

**SECTION 1. GENERATOR STATUS:**

A. 31 1 RCRA Generator Status (

- 1 = LQG }  
2 = SQG } Skip to Box 3  
3 = CESGQ }  
4 = Nongenerator (continue to E

B. Reason for not generating (Check

- 32 Never generated  
33 Out of business  
34 Only excluded or delis  
35 Only non-hazardous v

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

3. Article Addressed to:  
Illinois Environmental  
Protection Agency  
Bureau of Land #24  
P.O. Box 19276  
Springfield, IL 62776

4a. Article Number  
P 804-722-296

- 4b. Service Type  
☐ Registered ☐ Insured  
☒ Certified ☐ COD  
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

PS Form 3811, December 1991 ★U.S. GPO: 1992-323-402

**DOMESTIC RETURN RECEIPT**

C. 39 1 Status Time Period: 1= Expected to be the same next year and following years  
2 = Expected to change next year

**SECTION 2. ENTER THE SIC CODE(S) FOR THIS LOCATION**

40 2 8 9 3 44 \_\_\_\_\_ 48 \_\_\_\_\_ 52 \_\_\_\_\_

**SECTION 3. ON-SITE WASTE MANAGEMENT STATUS (enter one code for each question)**

- 56 1 RCRA regulated (permitted or interim status) storage  
57 RCRA permitted or interim status treatment, disposal, or recycling  
C. 58 Treatment, disposal, or recycling exempt from RCRA permit requirements

**SECTION 4. WASTE MINIMIZATION ACTIVITY DURING THE REPORTING YEAR. (Only LQGs are required to complete Section 4.)**

59 Y Does your facility have a waste minimization plan or organized approach to investigate source reduction and recycling opportunities? Enter Y for Yes or N for No

Comments: 83 Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

**Section 5.** The Environmental Protection Agency is authorized to require this information under the Illinois Compiled Statutes ("ILCS"), 1994 as amended, Chapter 415 ILCS 5/4 and 21. Disclosure of this information is required. Failure to disclose this information may result in civil and criminal penalties pursuant to 415 ILCS 5/42 and 44. This form has been approved by the Forms Management Center.

**Certification:** I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. Please print: Last Name McBurrows First Name John B. Title Plant Manager

C. Signature John McBurrows D. Date of Signature 2/14/00

Name and Telephone number of person to contact if there are questions about this report. \_\_\_\_\_

John Kujawa (815) 939-6655

Thank you for using Return Receipt Service.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF LAND POLLUTION CONTROL  
INVENTORY DATA INPUT FORM

Inventory I.D. Number	Card Type	Trans Code	Transaction Date (month, day, year)	Initials
0 9 1 0 5 5 0 0 1 1	0 6 0 C		0 3 / 0 1 / 0 0	H A W
1 10	11 13 14		15 20	21 23

-----ANNUAL REPORT ADDRESS-----

1. Company Name

S U N C H E M I C A L C O R P O R A T I O N

24 53

2. Street 3 2 0 0 F E S T I V A L D R I V E

54 78

3. P.O. Box

79 84

4. City K A N K A K E E

85 104

State I L Zip 6 0 9 0 1

105 106 107 115

5. Telephone Number: 8 1 5 / 9 3 9 - 0 1 3 6

116 119 122

6. Contact Person

(First Name)	(Last Name)
J O H N	K U J A W A
126 135	136 150

7. Contact Person Title K (enter code from list that best describes the contact person's title)

151

A = President B = Vice President C = Manager, Operations D = Environmental Coordinator/Manager E = Plant Manger F = Agent for Company G = Technical Manager	H = Environmental Specialist/Analyst/Technician I = Safety Coordinator/Director/Administrator/Officer J = Environmental Engineer K = Engineer, Plant/Process/Production/Project M = District/Regional Manager Z = Other: Specify _____
---	---

8. New Notifier Code \_\_\_\_\_ (G = Generator)

152

SUN CHEMICAL CORP  
3200 FESTIVAL DR  
KANKAKEE

IL  
60901

ILLINOIS Environmental Protection Agency  
1999 Hazardous Waste Report  
Form GM -- Generation and Management

Instructions for this form found on pages 17-32. Also SEE Common Errors on page 7 of the instructions.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: Parts cleaner solvent, spent monoethanolamine,  
from parts cleaner, ignitable hazard

B. EPA Hazardous Waste Code: D 0 0 6

C. SIC code: 2 8 9 3

D. Origin Code: 1 System type: M  
if origin code = 5

E. Source Code: A 0 5 A A

F. Point of Measurement: 1

G. Waste form code: B 2 0 3

H. Radioactive mixed: 2

I. TRI Constituent: 2 (if 1 or 2, go to section 2)

J. CAS numbers } 1. 76 2. 84 3. 92  
(From Form R) 4. 100 5. 108

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density 9 . 9 2 lb/gal (Same unit and density must be used for all quantities on this page).

Quantity generated in: B. Previous reporting year: 3 8 . 0

C. Current reporting year: 2 8 . 0

D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units at this location? N Y = Yes (continue to system 1) N = No (skip to section 3)

On-Site System 1: System Type M Status 142 Quantity managed on-site this year: 147

On-Site System 2: System Type M Status 157 Quantity managed on-site this year: 162

SECTION 3. OFF-SITE SHIPMENT

Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)

SITE 1. Name and address of facility: Safety-Kleen Corporation  
633 E. 138th St., Dolton, IL 60419

B. U.S. EPA ID No. of facility waste was shipped to: 1 1 D 9 8 0 6 1 3 9 1 3

C. System type shipped to: M 0 2 1 D. Off-site availability code: 1

E. Total quantity shipped in this reporting year: 2 8 . 0

SITE 2. Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: 200

C. System type shipped to: M D. Off-site availability code: 216

E. Total quantity shipped in this reporting year: 217

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? Y Y = Yes (Cont to Box B) N = No (Cont to Section 5)

B. Activity: W 0 1 W 5 9 W W W W C. Other Effects? (Y = Yes, N = No) 246

D. How many new waste minimization activities were implemented in this reporting year for this waste? 2 (Number)

E. Quantity recycled in reporting year due to new activities: 1 0

F. Activity/Production index: 258 G. Source Reduction quantity due to new activities: 261

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) N

B. Did this site store RCRA wastes on-site for more than 90 days and waste is still in storage at year end: (Y=Yes, N=No) 272

Quantity stored at year end and for 90 days or more, generated this reporting year: 273

Quantity stored at year end that was generated prior to this reporting year: 283

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 2 of 8

SUN CHEMICAL CORP  
3200 FESTIVAL DR  
KANKAKEE

IL  
60901

**ILLINOIS Environmental Protection Agency**  
**1999 Hazardous Waste Report**  
**Form GM -- Generation and Management**

Instructions for this form found on pages 17-32. Also SEE Common Errors on page 7 of the instructions.

## SECTION 1. WASTE DESCRIPTION

A. Waste Description: Waste ink heels, sludge from manufacturing process, ignitable

B. EPA Hazardous Waste Code: D 0 0 1

C. SIC code: 2893  
51

D. Origin Code: 1 System type: M  
55 if origin code = 5 56

E. Source Code: A 3 8 A 5 7 A        
60 63 66

F. Point of Measurement:  $\frac{1}{69}$

G. Waste form code: B 6 0 4  
70

H. Radioactive mixed:  $\frac{2}{74}$

1. TRI Constituent:  $\frac{3}{75}$  (if 1 or 2, go to section 2)

J. CAS numbers } 1. \_\_\_\_\_ 2. \_\_\_\_\_ 3. \_\_\_\_\_

(From Form R)) 4. 100 - - - - - 5. 108 - - - - -

## SECTION 2. QUANTITY GENERATED

A. UOM:  $\frac{1}{116}$  Density  $\frac{9.0}{117}$  lb/gal (Same unit and density must be used for all quantities on this page).

Quantity generated in: B. Previous reporting year: 3 4 6 0 0

C. Current reporting year: 121 2 4 6 0 0

D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units **at this location**? N Y = Yes (continue to system 1) N = No (skip to section 3)

On-Site System 1: System Type M Status Quantity managed on-site this year:

On-Site System 2: System Type M Status \_\_\_\_\_ Quantity managed on-site this year: \_\_\_\_\_

### SECTION 3. OFF- SITE SHIPMENT

Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)

SITE 1. Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: W I D 9 9 0 8 2 9 4 7 5

C. System type shipped to: M 0 6 1 D. Off-site availability code: 1

E. Total quantity shipped in this reporting year: 180 0 0

SITE 2. Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: M<sub>200</sub>1D980615298

C. System type shipped to: M 0 6 1 D. Off-site availability code: 216

E. Total quantity shipped in this reporting year: 217 — — — — — 6 6 0 . 0

## SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year?  $\frac{N}{227}$  Y = Yes (Cont to Box B) N = No (Cont to Section 5)

B. Activity:  $\frac{W}{228}$  —,  $\frac{W}{231}$  —,  $\frac{W}{234}$  —,  $\frac{W}{237}$  —,  $\frac{W}{240}$  —,  $\frac{W}{243}$  —

D. How many new waste minimization activities were implemented in this reporting year for this waste? 247 (Number)

E. Quantity recycled in reporting year due to new activities: \_\_\_\_\_

F. Activity/Production index: \_\_\_\_\_  
258

G. Source Reduction quantity due to new activities: \_\_\_\_\_  
261

## SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No)	N 273
--	----------

Did this site store RCRA wastes on-site for more than 90 days and waste is still in storage at year end: (Y=Yes, N=No)

Quantity stored at year end and for 90 days or more, generated this reporting year: 273 \_\_\_\_\_ . \_\_\_\_\_

Quantity stored at year end that was generated prior to this reporting year: \_\_\_\_\_

COMMENTS: 293 Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 4 of 8

SUN CHEMICAL CORP  
3200 FESTIVAL DR  
KANKAKEE

IL  
60901

ILLINOIS Environmental Protection Agency  
1999 Hazardous Waste Report  
Form GM -- Generation and Management

Instructions for this form found on pages 17-32. Also SEE Common Errors on page 7 of the instructions.

**SECTION 1. WASTE DESCRIPTION** Parts cleaning solvent; spent petroleum naptha

A. Waste Description: from parts cleaner; ignitable hazard  
B. EPA Hazardous Waste Code: D 0 0 1  
C. SIC code: 2 8 19 3  
D. Origin Code: 1 System type: M E. Source Code: A 0 5 A A  
F. Point of Measurement: 1 G. Waste form code: B 2 0 3  
H. Radioactive mixed: 2 I. TRI Constituent: 2 (if 1 or 2, go to section 2)  
J. CAS numbers } 1. 76 2. 84 3. 92  
(From Form R) } 4. 100 5. 108

**SECTION 2. QUANTITY GENERATED**

A. UOM: 1 Density 6.55 lb/gal (Same unit and density must be used for all quantities on this page).  
Quantity generated in: B. Previous reporting year: 1 1 7 4  
C. Current reporting year: 3 8 5 0  
D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units at this location? N Y = Yes (continue to system 1) N = No (skip to section 3)  
On-Site System 1: System Type M Status 146 Quantity managed on-site this year: 147  
On-Site System 2: System Type M Status 161 Quantity managed on-site this year: 162

**SECTION 3. OFF- SITE SHIPMENT**

Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)  
SITE 1. Name and address of facility: Safety-Kleen Corporation  
633 E. 138th Street, Dolton, IL. 60419  
B. U.S. EPA ID No. of facility waste was shipped to: 1 1 0 9 8 0 6 1 3 9 1 3  
C. System type shipped to: M 0 2 1 D. Off-site availability code: 1  
E. Total quantity shipped in this reporting year: 3 8 5 0  
SITE 2. Name and address of facility:  
B. U.S. EPA ID No. of facility waste was shipped to:  
C. System type shipped to: M D. Off-site availability code:  
E. Total quantity shipped in this reporting year:

**SECTION 4. WASTE MINIMIZATION ACTIVITIES**

A. Did you engage in any waste minimization activities for this reporting year? Y Y = Yes (Cont to Box B) N = No (Cont to Section 5)  
B. Activity: W 0 1, W 5 9, W, W, W, W C. Other Effects? (Y = Yes, N = No)  
D. How many new waste minimization activities were implemented in this reporting year for this waste? 7 8 9 0  
E. Quantity recycled in reporting year due to new activities:  
F. Activity/Production index: G. Source Reduction quantity due to new activities:

**SECTION 5. REGULATED STORAGE**

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No)  
B. Did this site store RCRA wastes on-site for more than 90 days and waste is still in storage at year end: (Y=Yes, N=No)  
Quantity stored at year end and for 90 days or more, generated this reporting year:  
Quantity stored at year end that was generated prior to this reporting year:

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 3 of 8

SUN CHEMICAL CORP  
3200 FESTIVAL DR  
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ILLINOIS Environmental Protection Agency  
1999 Hazardous Waste Report  
Form GM - Generation and Management

Instructions for this form found on pages 17-32. Also SEE Common Errors on page 7 of the instructions.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: Waste ink heels, sludge from UST removal, ignitable, toluene  
B. EPA Hazardous Waste Code: D 0 0 1 F 0 0 5  
C. SIC code: 2 8 9 3  
D. Origin Code: 1 System type: M E. Source Code: A 6 5 A A  
F. Point of Measurement: 1 G. Waste form code: B 2 0 3  
H. Radioactive mixed: 2 I. TRI Constituent: 3 (if 1 or 2, go to section 2)  
J. CAS numbers } 1. 76 2. 84 3. 92  
(From Form R) 4. 100 5. 108

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density: 9 . 0 0 lb/gal (Same unit and density must be used for all quantities on this page).  
Quantity generated in: B. Previous reporting year: 0 . 0  
C. Current reporting year: 2 6 0 0 . 0  
D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units at this location? N Y = Yes (continue to system 1) N = No (skip to section 3)  
On-Site System 1: System Type M Status 142 Quantity managed on-site this year: 147  
On-Site System 2: System Type M Status 157 Quantity managed on-site this year: 162

SECTION 3. OFF-SITE SHIPMENT

Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)  
SITE 1. Name and address of facility:  
B. U.S. EPA ID No. of facility waste was shipped to: W 1 D 9 9 0 8 2 9 4 7 5  
C. System type shipped to: M 0 6 1 D. Off-site availability code: 1  
E. Total quantity shipped in this reporting year: 1 8 0 0 . 0  
SITE 2. Name and address of facility:  
B. U.S. EPA ID No. of facility waste was shipped to: I L D 0 8 5 3 4 9 2 6 4  
C. System type shipped to: M 0 6 1 D. Off-site availability code: 1  
E. Total quantity shipped in this reporting year: 8 0 0 . 0

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? N Y = Yes (Cont to Box B) N = No (Cont to Section 5)  
B. Activity: W W W W W W C. Other Effects? (Y = Yes, N = No) 228 231 234 237 240 243  
D. How many new waste minimization activities were implemented in this reporting year for this waste? 247 (Number)  
E. Quantity recycled in reporting year due to new activities: 248  
F. Activity/Production index: 258 G. Source Reduction quantity due to new activities: 261

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) N  
Did this site store RCRA wastes on-site for more than 90 days and waste is still in storage at year end: (Y=Yes, N=No) 272  
Quantity stored at year end and for 90 days or more, generated this reporting year: 273  
Quantity stored at year end that was generated prior to this reporting year: 283

COMMENTS: 293 Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 5 of 8  
13



SUN CHEMICAL CORP  
3200 FESTIVAL DR  
KANKAKEE

IL  
60901

ILLINOIS Environmental Protection Agency  
1999 Hazardous Waste Report  
Form GM -- Generation and Management

Instructions for this form found on pages 17-32. Also SEE Common Errors on page 7 of the instructions.

**SECTION 1. WASTE DESCRIPTION** Ink & solvent, generated from the cleaning of ink,

A. Waste Description: pigment & solvents from magnetic separators, ignitable

B. EPA Hazardous Waste Code: D 0 0 1 F 0 0 5 31 35 39 43 47

C. SIC code: 2 8 9 3 51

D. Origin Code: 1 System type: M 55 if origin code = 5 56

E. Source Code: A 0 9 A 5 7 A 60 63 66

F. Point of Measurement: 1 69

G. Waste form code: B 2 0 9 70

H. Radioactive mixed: 2 74

I. TRI Constituent: 3 (if 1 or 2, go to section 2) 75

J. CAS numbers } 1. 76 2. 84 3. 92

(From Form R) } 4. 100 5. 108

**SECTION 2. QUANTITY GENERATED**

A. UOM: 1 Density: 8 . 5 0 lb/gal (Same unit and density must be used for all quantities on this page.) 116 117

Quantity generated in: B. Previous reporting year: 1 1 9 0 8 121

C. Current reporting year: 1 6 4 6 4 131

D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units at this location? N Y = Yes (continue to system 1) N = No (skip to section 3) 141

On-Site System 1: System Type M Status 146 Quantity managed on-site this year: 147 142

On-Site System 2: System Type M Status 161 Quantity managed on-site this year: 162 157

**SECTION 3. OFF-SITE SHIPMENT**

Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4) 172

SITE 1. Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: M 1 D 9 8 0 6 1 5 2 9 8 173

C. System type shipped to: M 0 6 1 D. Off-site availability code: 189 185

E. Total quantity shipped in this reporting year: 1 2 4 5 2 . 0 190

SITE 2. Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: W I D 9 9 0 8 2 9 4 7 5 200

C. System type shipped to: M 0 6 1 D. Off-site availability code: 216 212

E. Total quantity shipped in this reporting year: 4 0 1 2 . 0 217

**SECTION 4. WASTE MINIMIZATION ACTIVITIES**

A. Did you engage in any waste minimization activities for this reporting year? N Y = Yes (Cont to Box B) N = No (Cont to Section 5) 227

B. Activity: W W W W W W C. Other Effects? (Y = Yes, N = No) 246 228 231 234 237 240 243

D. How many new waste minimization activities were implemented in this reporting year for this waste? 247 (Number) 247

E. Quantity recycled in reporting year due to new activities: 248 248

F. Activity/Production index: 258 G. Source Reduction quantity due to new activities: 261 258 261

**SECTION 5. REGULATED STORAGE**

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) N 271

Did this site store RCRA wastes on-site for more than 90 days and waste is still in storage at year end: (Y=Yes, N=No) 272 272

Quantity stored at year end and for 90 days or more, generated this reporting year: 273 273

Quantity stored at year end that was generated prior to this reporting year: 283 283

COMMENTS: 293 Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 6 of 8 13

SUN CHEMICAL CORP  
3200 FESTIVAL DR  
KANKAKEE

IL  
60901

ILLINOIS Environmental Protection Agency  
1999 Hazardous Waste Report  
Form GM -- Generation and Management

Instructions for this form found on pages 17-32. Also SEE Common Errors on page 7 of the instructions.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: Ink and solvent from UST removal, toluene, ignitable

B. EPA Hazardous Waste Code: D 0 0 1 F 0 0 5 31 35 39 43 47

C. SIC code: 2 8 9 3  
51

D. Origin Code: 1 System type: M  
55 if origin code = 5 56

E. Source Code: A 6 5 A A  
60 63 66

F. Point of Measurement: 1  
69

G. Waste form code: B 2 0 3  
70

H. Radioactive mixed: 2  
74

I. TRI Constituent: 3 (if 1 or 2, go to section 2)  
75

J. CAS numbers } 1. 76 2. 84 3. 92  
(From Form R) } 4. 100 5. 108

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density: 7 1 8 lb/gal (Same unit and density must be used for all quantities on this page).  
116 117

Quantity generated in: B. Previous reporting year: 0 0  
121

C. Current reporting year: 6 5 0 0 0  
131

D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units at this location? N Y = Yes (continue to system 1) N = No (skip to section 3)  
141

On-Site System 1: System Type M Status 146 Quantity managed on-site this year: 147  
142

On-Site System 2: System Type M Status 161 Quantity managed on-site this year: 162  
157

SECTION 3. OFF-SITE SHIPMENT

Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)  
172

SITE 1. Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: I L D 0 8 5 3 4 9 2 6 4  
173

C. System type shipped to: M 0 6 1 D. Off-site availability code: 1  
185 189

E. Total quantity shipped in this reporting year: 6 5 0 0 0  
190

SITE 2. Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: 200

C. System type shipped to: M D. Off-site availability code: 216  
212

E. Total quantity shipped in this reporting year: 217

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? N Y = Yes (Cont to Box B) N = No (Cont to Section 5)  
227

B. Activity: W W W W W W C. Other Effects? (Y = Yes, N = No) 246  
228 231 234 237 240 243

D. How many new waste minimization activities were implemented in this reporting year for this waste? 247 (Number)

E. Quantity recycled in reporting year due to new activities: 248

F. Activity/Production index: 258 G. Source Reduction quantity due to new activities: 261

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) N  
271

Did this site store RCRA wastes on-site for more than 90 days and waste is still in storage at year end: (Y=Yes, N=No) 272

Quantity stored at year end and for 90 days or more, generated this reporting year: 273

Quantity stored at year end that was generated prior to this reporting year: 283

COMMENTS: 293 Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 7 of 8  
13

SUN CHEMICAL CORP  
3200 FESTIVAL DR  
KANKAKEE

IL  
60901

ILLINOIS Environmental Protection Agency  
1999 Hazardous Waste Report  
Form TI -- Transporter Identification

Instructions for this form found on page 33.

1. U.S. EPA ID No. ILD 984908202 Hauling Permit No. UPW 01512880H  
31 127

Transporter Name and Address: Safety-Kleen Systems, Inc.  
633 138th Street  
Dolton, Illinois 60419

2. U.S. EPA ID No. IND 058484114 Hauling Permit No. UPW 03144600H  
43 139

Transporter Name and Address: Heritage Transport LLC  
15330 Canal Bank Road  
Lemont, IL. 60439

3. U.S. EPA ID No. ULD 006493191 Hauling Permit No. UPW 164297  
55 151

Transporter Name and Address: Schiber Truck Company  
1701 S. Delmar  
Hartford, IL. 62048

4. U.S. EPA ID No. MOD 095038998 Hauling Permit No. UPW 00641580H  
67 163

Transporter Name and Address: Tri State Motor Transit Co.  
P. O. Box 113  
Joplin, Mo. 64802

5. U.S. EPA ID No. MID 021087275 Hauling Permit No. 2495  
79 175

Transporter Name and Address: Nortru Transport  
11700 Freud  
Detroit, Mi. 48214

6. U.S. EPA ID No. \_\_\_\_\_ Hauling Permit No. \_\_\_\_\_  
91 187

Transporter Name and Address:

7. U.S. EPA ID No. \_\_\_\_\_ Hauling Permit No. \_\_\_\_\_  
103 199

Transporter Name and Address:

8. U.S. EPA ID No. \_\_\_\_\_ Hauling Permit No. \_\_\_\_\_  
115 211

Transporter Name and Address:

COMMENTS: Enter Y(Yes) if you have comments regarding this page; attach extra sheet. Page 8 of 8  
223 13

September 14, 1990

Mr. Paul E. Dimock, Chief  
IL/MI/WI/ Enforcement Program Section  
United States Environmental Protection Agency  
Region 5  
230 South Dearborn Street  
Chicago, Illinois 60604

RE: NOTICE OF VIOLATION  
SUN CHEMICAL CORPORATION  
ILD 075603886 - REPLY TO THE ATTENTION OF 5HR-12

Dear Mr. Dimock:

Please forgive our oversight in not addressing violation points #4 and #5 in our compliance follow-up letter of August 9, 1990.

We have amended our waste analysis plan to include F005 waste. The attached exhibit will be inserted into our waste analysis plan and kept on site.

I hope this resolves points #4 and #5. If you have any further questions, please call.

Sincerely,

GENERAL PRINTING INK DIVISION



Michael Shoven  
Plant Engineer

MS:sg

CC: J. McBurrows

Attachment

RECEIVED  
SEP 18 1990  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

## V. LAND BAND

Effective November 8, 1986, the spent solvent waste specified in 40 CFR 261.31 as E.P.A. hazardous waste Nos. F001, F002, F003, F004, and F005 are prohibited under this part from land disposal.

Sun Chemical Corporation - GPI, Kankakee has determined that the shipment of hazardous waste, EPA Hazardous Waste Number F005, is a restricted waste for the purposes of land disposal restrictions found at 40 CFR Part 268. This waste material is prohibited from direct land disposal.

This determination has been made by Sun Chemical based upon knowledge of the waste and of the materials and processes generating the waste. This waste requires treatment prior to land disposal. This waste is subject to the treatment standard for F005 - non-waste waters. Concentration limits to be achieved by the treatment method(s) to be utilized are as specified below:

### TREATMENT STANDARDS FOR F005 SOLVENT-BASED WASTES

F005 Constituents of Concern	Total Composition (mg/kg)	TCLP (mg/L)
Acetone	0.37	-----
n-Butyl alcohol	0.37	-----
Ethyl acetate	0.37	-----
Ethyl benzene	0.031	-----
Methanol	0.37	-----
Methyl isobutyl ketone	0.37	-----
Methyl ethyl ketone	0.37	-----
Methylene chloride	0.037	-----
Toluene	0.031	-----
1,1,1,-Trichloroethane	0.044	-----
Trichloroethylene	0.031	-----
Xylenes	0.015	-----
bis (2-Ethylhexyl) phthalate	0.49	-----
Cyclohexanone	0.49	-----
1,2-Dichlorobenzene	0.49	-----
Naphthalene	0.49	-----
Nitrobenzene	0.49	-----
Chromium (total)	-----	0.094
Lead	-----	0.37

Comp.

SEP 24 1990

5HR-12

Mr. John McBurrows  
Plant Manager  
Sun Chemical Corporation  
3200 Festival Drive  
Kankakee, Illinois 60901-0352

Re: Sun Chemical Corporation  
ILD 075 603 886

Dear Mr. McBurrows:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on September 14, 1990. The stated actions appear to adequately address the land disposal restrictions deficiencies outlined in our September 12, 1990, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

cc: Glen Savage, IEPA, FOS  
Bill Radlinski, IEPA, CMS  
Michael Shoven, Sun Chemical  
5HR-12:ev:B.RUSSELL:9/21/90:FILENAME:scc

EW 9-24-90

RCRA ENFORCE- MENT	REC STAFF	DATE 9-24-90	RCR STAFF
INIT. DATE	9/24/90	P.E.D. 9-24-90	

SEP 12 1990

5HR-12

Mr. John McBurrows  
Plant Manager  
Sun Chemical Corporation  
3200 Festival Drive  
Kankakee, Illinois 60901-0352

Re: Notice of Violation  
Sun Chemical Corporation  
ILD 075 603 886

Dear Mr. Burrows:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on August 9, 1990. The stated actions appear to adequately address Violations #1, #2, and #3 of the land disposal restrictions deficiencies outlined in our July 3, 1990, Notice of Violation. However, there is no indication in the submittal that violation #4 and #5 have been adequately addressed. Please submit to this office, within ten (10) days of receipt of this Notice of Violation documentation demonstrating that the above remaining violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

Should you have further questions, please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

cc: Glen Savage, IEPA, FOS  
William Radlinski, IEPA  
Michael Shoven, Sun Chemical  
5HR-12:B.RUSSELL:ev:9/11/90:FILENAME:McBurrows

EV 9-11-90

RCRA ENFORCE- MENT	REB STAFF	REB STAFF	REB STAFF
INIT. DATE	9-11-90	9-11-90	9-11-90



August 9, 1990

Mr. Paul E. Dimock, Chief  
IL/MI/WI/ Enforcement Program Section  
United States Environmental Protection Agency  
Region 5  
230 South Dearborn Street  
Chicago, Illinois 60604

RE: NOTICE OF VIOLATION  
SUN CHEMICAL CORPORATION  
ILD 075603886 - REPLY TO THE ATTENTION OF 5HR-12

Dear Mr. Dimock:

Regarding the facility compliance inspection conducted at the Sun Chemical Corporation facility located in Kankakee, Illinois on March 22, 1990 and regarding the apparent violations noted during that inspection, we have taken the following steps as of this writing.

On July 18, 1990, we (Sun Chemical Corporation) attended a pre-enforcement conference and we agreed to the following:

As background, I would mention that our scrap ink is classified as D001. As a consequence, due to their similar characteristics, we classified our magnetic separator flush as D001 also.

It was pointed out at the July 18th meeting and we agreed that the flush solvent used for cleaning the separators is an F005 material. Our current handling procedure requires the labeling of mag flush as F005 and when sent for disposal along with waste ink in a common tanker, the manifest will contain both D001 and F005 designations along with a land band notice.

I hope this explanation resolves your five points of violation. If you have any further questions, please call.

Sincerely,

GENERAL PRINTING INK DIVISION

*Michael T. Shoven*

Michael Shoven  
Plant Engineer

MS:sg

CC: J. McBurrows

RECEIVED  
AUG 10 1990  
OFFICE OF EPA  
Waste Management Division  
U.S. EPA, REGION 5

JUL 23 1990

5HR-12

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. John McBurrows  
Plant Manager  
Sun Chemical Corporation  
3200 Festival Drive  
Kankakee, Illinois 60901-0352

Re: Notice of Violation  
Sun Chemical Corporation  
ILD 075 603 886

Dear Mr. McBurrows:

On March 22, 1990, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 spent solvents and dioxin-containing wastes became effective on November 8, 1986, for California List wastes on July 8, 1987, the First Third of hazardous wastes on August 8, 1988, the Second Third hazardous wastes on June 8, 1989, and for the Third Third on May 8, 1990, (40 CFR Part 268 and revisions to 40 CFR Parts 260-265 and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in violation of the following:

1. Failure to determine the appropriate treatability group of the waste as required by Section 268.41;
2. Failure to determine whether the waste exceeds treatment standards as required by Section 268.7(a);
3. Failure to provide a complete separate written notice attached to the manifest for each shipment of restricted wastes with the U.S. EPA hazardous waste numbers, the applicable treatment standards, manifests numbers, and waste analysis data, where available, as required by Section 268.7(a)(1);
4. Failure to revise the waste analysis plan to include 40 CFR Part 268 requirements in accordance with Section 265.13; and

5. Failure to retain all supporting data on site, as required by Section 268.7(a)(5).

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Barbara Russel of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA-CMS  
Glen Savage, IEPA-FOS

5HR-12:B. RUSSELL:or:3:7925:6/28/90:dISK# 1:FILENAME:McBurrows

5. Failure to retain all supporting data on site, as required by Section 268.7(a)(5).

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

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5HR-12:B. RUSSELL:or:3:7925:6/28/90:disk# 1:FILENAME:McBurrows

*P.R.*  
*6/28/90*

RCRA ENFORCE- MENT	RCR STAFF	RCR SECTION CHIEF	<i>P.R.</i>
INIT. DATE	<i>Be</i> <i>7/2/90</i>	<i>P.R.</i> <i>7-2-90</i>	



OUT  
A LAND DISPOSAL RESTRICTION IN ACTION

Facility: Sun Chemical Corporation  
 U.S. EPA I.D. No.: DLDO75603556 / 0910550011  
 Street: 3200 Festival Drive  
 City: Kankakee State: IL Zip: 60901-0352  
 Telephone: (815) 939-0136

Owner/Operator:

Street: Sun Chemical Corp 200 Park Ave.  
 City: New York State: NY Zip: 10166  
 Telephone: \_\_\_\_\_

Inspection Date: 3/22/90 Time: 10:00 - 3:00

Weather Conditions: no Rain

	Name	Agency/Title	Telephone
Inspectors:	Michael Cimaglia	IEPA/LSC	(708) 343-6786
	Charles Grossman	IEPA/EP	"
Facility Representative:	John McBurrows	Plant Manager	(815) 939-0136
	Michael Shouch	Plant Engineer	"

	Generate	Transport	Treat	Store	Dispose
F-Solvent	✓	_____	_____	✓	_____
Dioxin	_____	_____	_____	_____	_____
California List	_____	_____	_____	_____	_____
First Third	✓	_____	_____	_____	_____
Second Third	_____	_____	_____	_____	_____

RECEIVED

31 MAY 1990

IEPA/DLPC

RECEIVED

NOV 22 1989

IEPA/DLPC

## INSPECTION SUMMARY

### Processes That Generate LDR Wastes

### LDR Waste Management

#### Summary

No LDR Notice is sent with FOOS wastes due to improper classification. FOOS is sent as D001 - See RCRA Narrative

0910550011  
Sun Chemical Corp.  
3/22/90

#### NARRATIVE

Sun Chemical Corporation - General Printing Ink Division, hereafter referred to as Sun Chemical, is a manufacturer and distributor of various solvent based commercial printing inks. Sun Chemical manufactures its inks for large volume printers and distributes them in large capacity (2,500 and 3,000 lbs.) containers, as well as 55 gallon drums.

In November, 1980, Sun Chemical Corporation - General Printing Ink Division submitted Part A of the hazardous waste permit application (EPA Forms 3510-1 and 3510-3). Sun Chemical submitted this application in order to store containerized hazardous wastes on-site for longer than 90 days. Three areas are currently designated for hazardous waste storage. The South Waste Area is located at the back (southwest) of the manufacturing facility adjacent to a railroad spur. The North West Waste Area is located at the back (northwest) of the manufacturing facility next to a storage garage. The North East Waste Area is located at the back of the facility across from the storage garage, directly north of the South Waste Area.

Hazardous waste is produced from the manufacturing process, floor washing, filtering and a parts washer.

#### Hazardous Waste

##### - Hazardous Waste Liquid (K086)

- Generated from floor washing.
- Generate around 4,000 gals per month.
- Last shipment went to Industrial Fuel in Indiana.
- There were 500 gals on site at the time of the inspection.

##### - Waste Flammable Liquid (D001) - Waste Inks

- Generated from out of Spec Inks and clean up of spills.
- Generate around 1,000 gals per month.
- Last shipment went to Heritage Environmental in Indiana.
- There were 70 drums on site during the inspection.

##### - Waste Ink Heals (F005, D001)

- Produced from solvent washing of magnetic separators.
- Generate around 200 gals per month.
- Last shipment went to Heritage Environmental in Indiana.
- There were 47 drums on ~~Site~~ during the inspection.

##### - Waste Petroleum Naphtha (D001)

- Generated from a parts cleaner.
- Generate around 30 gals every 2 months.
- Last shipments went to Safety Kleen in Mokena.
- There was none on site during the inspection.



### Non Hazardous Waste

#### - Waste Filter Cartridges

- Generated by Filtering Inks.
- Rendered non-hazardous by distilling solvents off cartridges.
- Last shipment went to Kankakee Landfill.
- There were 10 cubic yards on site during the inspection.

### Hazardous Waste Units

#### 1. Container Storage units (S01)

- The facility is currently undergoing closure for its two permitted units, the South and North West storage units.
- The facility is actively storing in a third unit, the North East unit.
- All three units are, or have been, used to store waste flammable liquids and waste ink heels.

#### 2. Underground Accumulation Tank

- A 5,000 gallon tank for the accumulation of K086 floor washing.
- The tank is over 15 years old and requires secondary containment.

#### 3. Accumulation Area

- An accumulation area for filter cartridges located next to the distillation unit.

#### 4. Various satellite accumulation areas throughout the plant.

### Notes

1. Sun Chemical appears to be a generator and storer of hazardous waste.
2. Sun Chemical is undergoing a waste minimization program. They re-incorporate most of the inks and solvents back into the process.
3. Sun Chemical is using what appears to be a non regulated distillation process to remove solvents from the filter cartridges.
4. Sun Chemical is currently undergoing closure for its two permitted container storage areas. They have a third storage area which is still in operation.
5. Hundreds of drums from the distillation unit are stored both inside and outside the building. These drums are reported to contain water with extremely low levels of solvent. They are waiting for approval from the Kankakee Sanitary District prior to dumping in the sewers.

Apparent Violations

- 722.111 - F005 waste solids are being sent out as D001.
- 722.134(a) - Accumulation drums at distillation unit were not labeled with dates of accumulation.
  - Accumulation drums not labeled with the words "Hazardous Waste".
  - Accumulation tank not labeled with the words "Hazardous Waste".
- (725.291) - Accumulation tank has not had an assessment.
- (725.293) - Accumulation tank has no secondary containment.
- 722.134(c)
  - (725.273) - Open drums at satellite accumulation areas.
- 725.152 - Arrangements with local authorities do not appear in the Contingency Plan.
- 725.175 - 1987 and 1988 facility annual reports were not available on site for inspection.

MC:1b:04351

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

a. F001 through F005 spent solvents

Yes ☒ No ☐ List\* F005

b. Dioxin-containing Wastes

Yes ☐ No ☐ List\* \_\_\_\_\_

c. California List Wastes

Yes ☐ No ☐ List\* \_\_\_\_\_

d. First and Second Third Wastes

Yes ☒ No ☐ List\* K056

\* List wastes if room allows or attach Appendix A.

Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments \_\_\_\_\_

b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments \_\_\_\_\_

c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments \_\_\_\_\_

- d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ☐ No ☒ Comments \_\_\_\_\_

- e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).

Yes ☐ No ☒ Comments \_\_\_\_\_

- f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).

Yes ☐ No ☒ Comments \_\_\_\_\_

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☐ No ☒ NA ☐

If yes, check the appropriate treatability group.

☐ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)  
☐ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☐ No ☒ NA ☐

If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

\* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ☐ No ☐ NA ☒

If yes, specify the method: \_\_\_\_\_

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ☐ No ☐ NA ☒

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ☐ No ☐ NA ☒

4. Does the generator mix restricted wastes with different treatment standards?

Yes ☐ No ☒ Comments \_\_\_\_\_

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ☐ No ☐ Comments \_\_\_\_\_

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ☐ No ☒

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

\_\_\_\_\_  
\_\_\_\_\_

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ☐ No ☐

- TCLP Yes ☐ No ☒ NA ☐

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Total constituent analysis Yes ☒ No ☐ NA ☐

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

K036, K005 (as doc)  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- pH  $\leq 2$  Yes ☐ No ☒ NA ☐

List the wastes for which pH testing was used.

\_\_\_\_\_

- Paint Filter Liquid Test Yes ☐ No ☐ NA ☐

List the wastes for which PFLT was used.

\_\_\_\_\_

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ☐ No ☒ NA ☐

### C. Management

#### 1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ☒ No ☐ Comments K005

If yes, the TSD Checklist must be completed.



## 2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ☒ No ☐ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

<u>Waste Code</u>	<u>Facilities</u>	<u>Treat/Store</u>
K056	Industrial Fuels Refinery	Treat
K005	Heritage Environmental Refinery	Treat

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ☐ No ☒ Notification sent for K056 but not K005

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☒ No ☐

Applicable treatment standards and prohibition levels Yes ☒ No ☐

Manifest number Yes ☒ No ☐

Waste analysis data, if available Yes ☒ No ☐

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ☐ No ☒ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

<u>Waste Code</u>	<u>Facility</u>

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes ☐ No ☐

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☐ No ☐

Applicable treatment standards and prohibition levels Yes ☐ No ☐

Manifest number Yes ☐ No ☐

Waste analysis data, if available Yes ☐ No ☐

Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes ☐ No ☐

- c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes ☐ No ☒ (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes ☐ No ☐

- Does the notification contain the following information?

EPA hazardous waste number Yes ☐ No ☐

The corresponding treatment standards and all applicable prohibitions Yes ☐ No ☐

Manifest number Yes ☐ No ☐

Waste analysis data, if available Yes ☐ No ☐

Date the waste is subject to the prohibitions Yes ☐ No ☐

- d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes ☐ No ☒ (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(iii)	Manifest number	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(iv)	Waste analysis data, if available	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

### 3. "Soft Hammer" Demonstrations/Certifications

- a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ☒ No ☐

- b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ☒ No ☐

- c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ☒ No ☐

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ☒ No ☐

- d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?

Yes ☒ No ☐

Addresses

Yes ☒ No ☐

Telephone numbers

Yes ☒ No ☐

Contact dates

Yes ☒ No ☐

Certification statement

Yes ☒ No ☐

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ☒ No ☐ NA ☐

If yes, attach a copy of written discussion.

- f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ☒ No ☐

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ☒ No ☐

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ☒ No ☐ NA ☐

#### 4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ☒ No ☐ Comments 

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D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

Yes ☐ No ☒ Comments \_\_\_\_\_

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

Yes ☐ No ☐ NA ☒ Comments \_\_\_\_\_

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)? \_\_\_\_\_

Yes ☐ No ☒

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes ☐ No ☐ Comments \_\_\_\_\_

If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

Yes ☐ No ☐ NA ☒ Comments \_\_\_\_\_

If yes, the TSD checklist must be completed.

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TRANSPORTER CHECKLIST

*Does not transport*

## TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?

Yes ☐ No ☐

If yes, check the appropriate regulatory status:

☐ Interim status for storage  
☐ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

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- B. Does the transporter mix, combine, or recontainerize wastes?

Yes ☐ No ☐

If yes, list the restricted wastes that have been mixed.

---

---

---

- C. Is the waste treated in an exempt treatment process on-site?

Yes ☐ No ☐

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

## TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent Yes ☐ No ☒ NA ☐  
(TCLP)\*Dioxin Yes ☐ No ☐ NA ☒  
(TCLP)California List Yes ☐ No ☐ NA ☒  
(PFLT and/or total constituent analysis)\*First & Second Third Yes ☐ No ☒ NA ☐  
(TCLP and/or total constituent analysis)\* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)  
PFLT= Paint Filter Liquids Test (SW-846)

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes ☒ No ☐ Comments \_\_\_\_\_

- a. What date was the waste analysis plan last revised?

Feb 26 1986

- b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

- c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ☐ No ☒ NA ☐



- d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs)).

Yes ☐ No ☐ NA ☒

- e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified EDAT\* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ☒ No ☐ NA ☐

\* EDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes ☒ No ☐

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ☒ No ☐ Comments \_\_\_\_\_

B. Storage (268.50)

1. Are prohibited wastes\* stored on-site?

Yes ☐ No ☒ (If no, go to C, Treatment.)

\* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

\_\_\_\_\_ Tanks  
 \_\_\_\_\_ Containers  
 \_\_\_\_\_ Other (Identify inappropriate storage unit(s)). \_\_\_\_\_

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes ☒ No ☐ NA ☐

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?  
 Yes ☒ No ☐
5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?  
 Yes ☒ No ☐ NA ☐
6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☐ No ☐ NA ☒

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

Yes ☐ No ☐

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

Yes ☐ No ☐ NA ☒

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

Yes ☐ No ☒ NA ☐

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

Yes ☐ No ☐ NA ☐

If yes, state how: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

- a. In a facility meeting the TSCA criteria in 761.65(b)?

Yes ☐ No ☐ NA ☒

- b. More than one year [268.50(f)]?

Yes ☐ No ☐ NA ☒

C. TreatmentNo treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ☐ No ☒ (If no, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

Waste CodeTreatment Processes

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

3. Was dilution used as a substitute for treatment [268.3]?

Yes ☐ No ☐ Comments \_\_\_\_\_

4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?

Yes ☐ No ☐ Comments \_\_\_\_\_

Have treatment standards or prohibition levels been met?

Yes ☐ No ☐ Comments \_\_\_\_\_

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

Yes ☐ No ☐ NA ☐

If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

Yes ☐ No ☐ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

Yes ☐ No ☐

7. Does the facility treat "soft hammer" wastes?

Yes \_\_\_\_\_ No \_\_\_\_\_ (If no, go to 8.)

- a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

Yes \_\_\_\_\_ No \_\_\_\_\_

- b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

Yes \_\_\_\_\_ No       

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

Yes                      No                      NA

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Identify waste codes and off-site facilities:

Waste Code	Facility

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

Yes \_\_\_\_\_ No \_\_\_\_\_

D. Surface Impoundments

1. Are prohibited wastes placed in surface impoundments for treatment?  
Yes ☐ No ☒ List \_\_\_\_\_ (If no, go to E, Land Disposal.)
2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?  
Yes ☐ No ☐
3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?  
Yes ☐ No ☐
4. If the minimum technology requirements have not been met, has a waiver been granted for that unit?  
Yes ☐ No ☐ NA ☐
5. Have the Subpart F groundwater monitoring requirements been met?  
Yes ☐ No ☐ NA ☐
6. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?  
Yes ☐ No ☐  
Attach test results.
7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?  
Sludge Yes ☐ No ☐ Waste Code \_\_\_\_\_  
Supernatant Yes ☐ No ☐ Waste Code \_\_\_\_\_
8. Provide the frequency of analyses conducted on treatment residues:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

Yes \_\_\_ No \_\_\_

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

- a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

Yes \_\_\_ No \_\_\_

- b. Are residues subsequently managed in another surface impoundment?

Yes \_\_\_ No \_\_\_

- c. Are residues treated prior to disposal?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

If yes, are waste residues treated on-site or off-site?

On-site \_\_\_\_\_ Off-site \_\_\_\_\_

Identify waste code and treatment method:

<u>Waste Code</u>	<u>Treatment Method</u>
_____	_____
_____	_____
_____	_____

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

E. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

Yes ☐ No ☒

Note: Do not include surface impoundments addressed in D, Surface Impoundments.

If yes, specify which units and what wastes each unit has received:

---



---

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

Yes ☐ No ☐

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

Yes ☐ No ☐

If yes, at what frequency? 

---

---

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

Yes ☐ No ☐

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

Yes ☐ No ☐ Comments 

---

If yes, have the minimum technology requirements been met for all units receiving such wastes?

Yes ☐ No ☐



6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?

Yes \_\_\_ No \_\_\_ NA \_\_\_

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

Yes \_\_\_ No \_\_\_ NA \_\_\_

8. Are restricted wastes placed in underground injection wells?

Yes \_\_\_ No \_\_\_ List \_\_\_\_\_



RECEIVED  
MAR 29 1990

GULF COAST LABORATORIES, INC.

17 Bond St., University Park, Illinois 60466

Phones (312) 534-5200 (219) 885-7077 (815) 723-753

ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

ANALYTICAL REPORT

TO: Sun Chemical Corporation  
3200 Festival Drive - P.O. Box 352  
Kankakee, Illinois 60901

DATE: June 18, 1986

ATTN: Mr. Michael T. Shoven

RE: Waste Ink  
PO# GP1136352  
Sample Date: 05/08/86  
Received Date: 05/08/86  
GCL #: 84045

GCL #	PARAMETERS	ANALYST	RESULTS	
84045	Alkalinity as Calcium Carbonate	sbg	0.27	%
84045	Ash at 550 C	rhk	3.1	%
84045	Bomb Calorimetry	gww	17190	BTU/lb
84045	Chlorides	ct	< 0.1	%
84045	Cyanides, Reactive	jab	20.8	mg/kg
84045	Cyanides, Total	jab	41	mg/kg
84045	Flash Point (Closed Cup)	gww	74	F
84045	pH - 10% Solution	ps	5	
84045	Phenols	jab	5.3	mg/kg
84045	Solids, Total	rhk	34.2	%
84045	Sulfides	sbg	7.0	mg/kg
84045	Sulfides, Reactive	sbg	< 5.0	mg/kg
84045	Sulfur	mas	< 0.1	%

Page 1 of 3

Approved: \_\_\_\_\_

*John Boudreau*

Analyst \_\_\_\_\_

Date

*06/18/86*



GULF COAST LABORATORIES, INC.

2417 Bond St., University Park, Illinois 60466

Phones (312) 534-5200 (219) 885-7077 (815) 723-7531

## ANALYTICAL REPORT

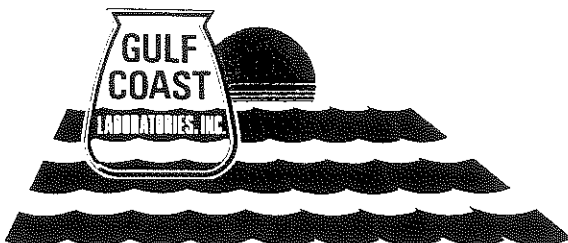
TO: Sun Chemical Corporation  
3200 Festival Drive - P.O. Box 352  
Kankakee, Illinois 60901

DATE: June 18, 1986

ATTN: Mr. Michael T. Shoven

RE: Waste Ink  
PO# GP1136352  
Sample Date: 05/08/86  
Received Date: 05/08/86  
GCL #: 84045

GCL #	PARAMETERS	ANALYST	RESULTS		
84045	PCB's, Total	lsm	<	5	mg/kg
84045	Aroclor 1016	lsm	<	5	mg/kg
84045	Aroclor 1242	lsm	<	5	mg/kg
84045	Aroclor 1248	lsm	<	5	mg/kg
84045	Aroclor 1254	lsm	<	5	mg/kg
84045	Aroclor 1260	lsm	<	5	mg/kg
84045	Arsenic	jh	<	0.4	mg/kg
84045	Barium	jh		3.7	mg/kg
84045	Cadmium	ct	<	1.0	mg/kg
84045	Chromium	ct		2.0	mg/kg
84045	Copper	ct		6073	mg/kg
84045	Lead	ct		4.1	mg/kg
84045	Mercury	rb	<	0.05	mg/kg
84045	Nickel	ct		18	mg/kg
84045	Selenium	jh	<	0.4	mg/kg
84045	Silver	ct	<	1.0	mg/kg
84045	Zinc	ct		5120	mg/kg



GULF COAST LABORATORIES, INC.

2417 Bond St., University Park, Illinois 60466

Phones (312) 534-5200 (219) 885-7077 (815) 723-7533

ANALYTICAL REPORT

TO: Sun Chemical Corporation  
3200 Festival Drive - P.O. Box 352  
Kankakee, Illinois 60901

DATE: June 18, 1986

ATTN: Mr. Michael T. Shoven

RE: Waste Ink  
PO# GP1136352  
Sample Date: 05/08/86  
Received Date: 05/08/86  
GCL #: 84045

GCL #	PARAMETERS	ANALYST	RESULTS		
84045	Arsenic EP Toxicity	jh	<	0.5	mg/l
84045	Barium EP Toxicity	jh	<	10	mg/l
84045	Cadmium EP Toxicity	ct	<	0.1	mg/l
84045	Chromium EP Toxicity	ct	<	0.5	mg/l
84045	Copper EP Toxicity	jh		0.9	mg/l
84045	Lead EP Toxicity	ct		0.4	mg/l
84045	Mercury EP Toxicity	jh	<	0.02	mg/l
84045	Nickel EP Toxicity	ct	<	0.5	mg/l
84045	Selenium EP Toxicity	jh	<	0.1	mg/l
84045	Silver EP Toxicity	ct	<	0.5	mg/l
84045	Zinc EP Toxicity	jh		130	mg/l

Page 3 of 3

\*NOTE: Wet Weight Basis

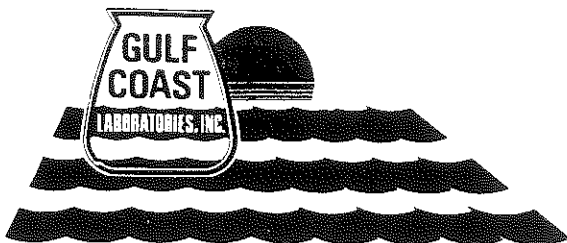
Approved: \_\_\_\_\_

*John Bondreau*

Analyst \_\_\_\_\_

Date \_\_\_\_\_

*06/17/86*



GULF COAST LABORATORIES, INC.

2417 Bond St., University Park, Illinois 60466

Phones (312) 534-5200 (219) 885-7077 (815) 723-7533

ANALYTICAL REPORT

TO: Sun Chemical Corporation  
3200 Festival Drive - P.O. Box 352  
Kankakee, Illinois 60901

DATE: June 18, 1986

ATTN: Mr. Michael T. Shoven

RE: Water Washings  
PO# GP1136352  
Sample Date: 05/08/86  
Received Date: 05/08/86  
GCL #: 84044

GCL #	PARAMETERS	ANALYST	RESULTS		
84044	Alkalinity as Calcium Carbonate	sbg	<	0.1	%
84044	Ash at 550 C	rhk		0.2	%
84044	Bomb Calorimetry	gww		600	BTU/lb
84044	Chlorides	ct	<	0.1	%
84044	Cyanides, Reactive	jab	<	5	mg/kg
84044	Cyanides, Total	jab		28	mg/kg
84044	Flash Point (Closed Cup)	gww		84	F
84044	pH - 10% Solution	ps		7.7	
84044	Phenols	jab	<	5	mg/kg
84044	Solids, Total	rhk		0.5	%
84044	Sulfides	sbg	<	5	mg/kg
84044	Sulfides, Reactive	sbg	<	5	mg/kg
84044	Sulfur	mas	<	0.1	%

Page 1 of 3

RECEIVED  
MAR 29 1990

ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

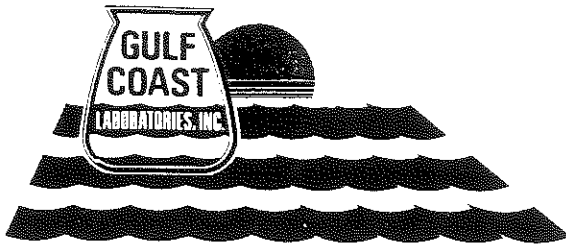
Approved: \_\_\_\_\_

*John Bondreau*

Analyst \_\_\_\_\_

Date \_\_\_\_\_

*06/18/86*



GULF COAST LABORATORIES, INC.

2417 Bond St., University Park, Illinois 60466

Phones (312) 534-5200 (219) 885-7077 (815) 723-753

ANALYTICAL REPORT

TO: Sun Chemical Corporation  
3200 Festival Drive - P.O. Box 352  
Kankakee, Illinois 60901

ATTN: Mr. Michael T. Shoven

DATE: June 18, 1986

RE: Water Washings

PO# GP1136352

Sample Date: 05/08/86

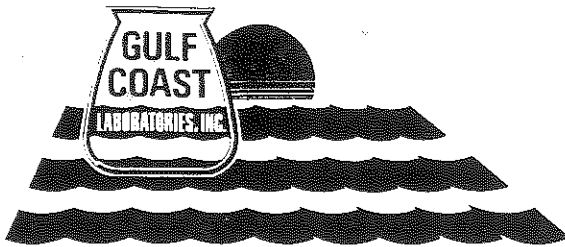
Received Date: 05/08/86

GCL #: 84044

GCL #	PARAMETERS	ANALYST	RESULTS		
84044	PCB's, Total	lsm	<	5	mg/kg
84044	Aroclor 1016	lsm	<	5	mg/kg
84044	Aroclor 1242	lsm	<	5	mg/kg
84044	Aroclor 1248	lsm	<	5	mg/kg
84044	Aroclor 1254	lsm	<	5	mg/kg
84044	Aroclor 1260	lsm	<	5	mg/kg
84044	Arsenic	jh	<	0.4	mg/kg
84044	Barium	jh		3.0	mg/kg
84044	Cadmium	ct	<	1.0	mg/kg
84044	Chromium	ct		4.0	mg/kg
84044	Copper	ct		0.60	mg/kg
84044	Lead	ct	<	2.0	mg/kg
84044	Mercury	rb	<	0.05	mg/kg
84044	Nickel	ct	<	2.0	mg/kg
84044	Selenium	jh	<	0.4	mg/kg
84044	Silver	ct	<	1.0	mg/kg
84044	Zinc	ct	<	1.0	mg/kg

Approved: John Boudreau

Analyst \_\_\_\_\_ Date 06/18/86



GULF COAST LABORATORIES, INC.

2417 Bond St., University Park, Illinois 60466

Phones (312) 534-5200 (219) 885-7077 (815) 723-7531

ANALYTICAL REPORT

TO: Sun Chemical Corporation  
3200 Festival Drive - P.O. Box 352  
Kankakee, Illinois 60901

ATTN: Mr. Michael T. Shoven

DATE: June 18, 1986

RE: Water Washings

PO# GP1136352

Sample Date: 05/08/86

Received Date: 05/08/86

GCL #: 84044

GCL #	PARAMETERS	ANALYST	RESULTS	
84044	Arsenic EP Toxicity	jh	< 0.5	mg/l
84044	Barium EP Toxicity	jh	< 10	mg/l
84044	Cadmium EP Toxicity	ct	< 0.1	mg/l
84044	Chromium EP Toxicity	ct	< 0.5	mg/l
84044	Copper EP Toxicity	jh	< 0.5	mg/l
84044	Lead EP Toxicity	ct	0.4	mg/l
84044	Mercury EP Toxicity	jh	< 0.02	mg/l
84044	Nickel EP Toxicity	ct	< 0.5	mg/l
84044	Selenium EP Toxicity	jh	< 0.1	mg/l
84044	Silver EP Toxicity	ct	< 0.5	mg/l
84044	Zinc EP Toxicity	jh	0.7	mg/l

Page 3 of 3

\*NOTE: Wet Weight Basis

Approved: \_\_\_\_\_

*John Boudreau*

Analyst \_\_\_\_\_

Date \_\_\_\_\_

*06/18/86*



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

5HS-12

JUN 09 1988

Mr. John W. McBurrows  
Sun Chemical Corp.  
3200 Festival Drive  
Kankakee, Illinois 60901

Re: Sun Chemical Corp.  
ILD 075 603 886

Dear Mr. McBurrows:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on May 12, 1988. The stated actions appear to adequately address the land disposal restrictions deficiencies outlined in our February 17, 1988, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

cc: Glenn Savage, IEPA, FOS  
Harry Chappel, IEPA, CMS

5HS-12:ZTHOMAS:6/7/88:ev      DISK #4

## CONCURRENCES

SYMBOL							
SURNAME	<i>E.V.</i>	<i>ZT</i>	<i>Red</i>				
DATE	<i>6/7/88</i>	<i>6/7/88</i>	<i>6-9-88</i>				



May 12, 1988

Mr. Paul E. Dimock  
United States Environmental Protection  
Agency Region 5  
230 South Dearborn St.  
Chicago, Illinois 60604

RE: NOTICE OF VIOLATION  
SUN CHEMICAL CORPORATION  
ILD 075603886

Dear Mr. Dimock:

With respect to the violations cited during your agency's inspection of the Sun Chemical facility located at 3200 Festival Drive in Kankakee, Illinois on February 17, 1988, the following corrective action has been taken:

- 1) We have implemented a policy to submit a separate written notice to be attached to the manifest for each shipment of F-solvent waste along with the U.S. E.P.A. Hazardous Waste numbers, the applicable treatment standards, manifest number, and waste analysis data as required by Section 268.7 (a) (1): See Attachment A.
- 2) The waste analysis plan has been revised to include 40 CFR Part 268 Requirement in accordance with Section 265.13.

Attached for your review is a copy of our waste analysis for the lab solvent that is referred to as F-005 waste. The intent of this analysis concentrated on EP toxicity. I have forwarded a sample of this waste stream to Gulf Coast Laboratories, Inc. at 2417 Bend Street, University Park, Illinois. The purpose is to have this waste analyzed for F-001 - F-005 components. This analysis will be included in our waste analysis plan and attached to the manifest with each shipment as required by Section 265.13.

We have decided to use the format that your office submitted to my attention entitled: "Notice of Land Disposal Restriction of Waste" for this purpose.

It is my belief that these actions taken will bring us into compliance.

If there are any additional problems or concerns you may have regarding the actions taken, please contact me.

Sincerely,

GENERAL PRINTING INK DIVISION

A handwritten signature in dark ink, appearing to read "John McBurrows". The signature is fluid and cursive, with the first name "John" and last name "McBurrows" clearly distinguishable.

John McBurrows  
Plant Manager

JM:sg

Attachment

Attachment.



GULF COAST LABORATORIES, INC.

2417 Bond St., University Park, Illinois 60466

Phones (312) 534-5200 (219) 885-7077 (815) 723-7533

ANALYTICAL REPORT

TO: Sun Chemical Corporation  
3200 Festival Drive - P.O. Box 352  
Kankakee, Illinois 60901

DATE: June 18, 1986

RE: Lab Solvent

PO# GP1136352

Sample Date: 05/08/86

Received Date: 05/08/86

GCL #: 84043

ATTN: Mr. Michael T. Shoven

GCL #	PARAMETERS	ANALYST	RESULTS
84043	PCB's, Total	lsm	< 5 mg/kg
84043	Aroclor 1016	lsm	< 5 mg/kg
84043	Aroclor 1242	lsm	< 5 mg/kg
84043	Aroclor 1248	lsm	< 5 mg/kg
84043	Aroclor 1254	lsm	< 5 mg/kg
84043	Aroclor 1260	lsm	< 5 mg/kg
84043	Arsenic	jh	< 0.4 mg/kg
84043	Barium	jh	87 mg/kg
84043	Cadmium	ct	< 1.0 mg/kg
84043	Chromium	ct	2.2 mg/kg
84043	Copper	ct	95 mg/kg
84043	Lead	ct	6.5 mg/kg
84043	Mercury	rb	< 0.05 mg/kg
84043	Nickel	ct	6.4 mg/kg
84043	Selenium	jh	< 0.4 mg/kg
84043	Silver	ct	< 1.0 mg/kg
84043	Zinc	ct	2830 mg/kg

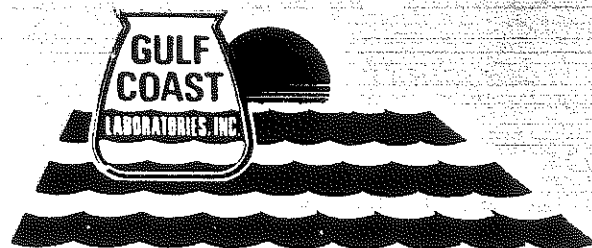
Page 2 of 3

Approved: John Bourdieu

Analyst

Date

06/18/86



GULF COAST LABORATORIES, INC.

2417 Bond St., University Park, Illinois 60466

Phones (312) 534-5200 (219) 885-7077 (815) 723-7533

# ANALYTICAL REPORT

TO: Sun Chemical Corporation  
3200 Festival Drive - P.O. Box 352  
Kankakee, Illinois 60901

DATE: June 18, 1986

ATTN: Mr. Michael T. Shoven

RE: Lab Solvent  
PO# GP1136352  
Sample Date: 05/08/86  
Received Date: 05/08/86  
GCL #: 84043

GCL #	PARAMETERS	ANALYST	RESULTS	
84043	Alkalinity as Calcium Carbonate	sbg	0.33	%
84043	Ash at 550 C	rhk	2.5	%
84043	Bomb Calorimetry	gww	16860	BTU/lb
84043	Chlorides	ct	< 0.1	%
84043	Cyanides, Reactive	jab	< 5	mg/kg
84043	Cyanides, Total	jab	11	mg/kg
84043	Flash Point (Closed Cup)	gww	74	F
84043	pH - 10% Solution	ps	4	
84043	Phenols	jab	< 5	mg/kg
84043	Solids, Total	rhk	13.9	%
84043	Sulfides	sbg	< 5	mg/kg
84043	Sulfides, Reactive	sbg	< 5	mg/kg
84043	Sulfur	mas	< 0.1	%

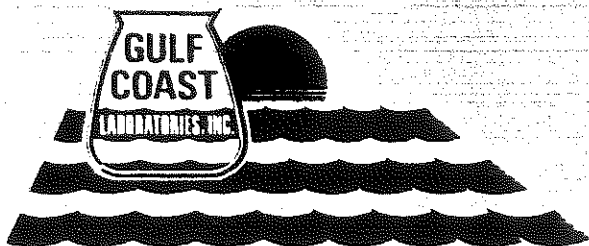
Page 1 of 3

Approved: John Bourdreau

Analyst

Date 06/18/86





GULF COAST LABORATORIES, INC.

2417 Bond St., University Park, Illinois 60466

Phones (312) 534-5200 (219) 885-7077 (815) 723-7533

ANALYTICAL REPORT

TO: Sun Chemical Corporation  
3200 Festival Drive - P.O. Box 352  
Kankakee, Illinois 60901

DATE: June 18, 1986

ATTN: Mr. Michael T. Shoven

RE: Lab Solvent  
PO# GP1136352  
Sample Date: 05/08/86  
Received Date: 05/08/86  
GCL #: 84043

GCL #	PARAMETERS	ANALYST	RESULTS
84043	Arsenic EP Toxicity	jh	< 0.5 mg/l
84043	Barium EP Toxicity	jh	< 10 mg/l
84043	Cadmium EP Toxicity	ct	0.7 mg/l
84043	Chromium EP Toxicity	ct	< 0.5 mg/l
84043	Copper EP Toxicity	jh	< 0.5 mg/l
84043	Lead EP Toxicity	ct	1.0 mg/l
84043	Mercury EP Toxicity	jh	< 0.02 mg/l
84043	Nickel EP Toxicity	ct	< 0.5 mg/l
84043	Selenium EP Toxicity	jh	< 0.1 mg/l
84043	Silver EP Toxicity	ct	< 0.5 mg/l
84043	Zinc EP Toxicity	jh	62 mg/l

Page 3 of 3

\*NOTE: Wet Weight Basis

Approved: \_\_\_\_\_

*John Boudreau*

Analyst \_\_\_\_\_

Date \_\_\_\_\_

*06/18/86*

WASTE SAMPLING AND ANALYSIS PLAN

The waste sampling and analysis plan is an outline for the purpose of gathering samples of each waste stream and getting them analyzed in order to properly store, transport, and dispose of both the solid and liquid waste generated by this plant.

No waste is brought into this location from any off-site generator. All waste is generated on site.

As outlined in the plan, each waste stream will be sampled and analyzed to determine if it is a hazardous or non-hazardous waste according to the characteristics of ignitability, corrosivity, reactivity, and E.P. toxicity.

Additionally, all F001 through F005 waste will be analyzed. A copy of this analysis will be attached to the shipping manifest each time this waste stream is shipped off site for treatment. See Attachment 63A.

Analysis of these waste streams is to be done every three years unless there is a change with the products used or the process generating the stream would warrant a new sample and analysis.

The results of these analyses will be kept on file by the emergency coordinator.



NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

EPA ID J. ILD075603886

SIGNATURE \_\_\_\_\_

CITY: \_\_\_\_\_

Under manifest number \_\_\_\_\_ the generator noted below is shipping  
to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR  
268.7, the generator is hereby providing notice that the waste is restricted and the appropriate  
treatment standards (from Table CCWE of 40 CFR 268.41) are as follows:

Constituent

Treatment Standard

ppm

Use reverse side

ppm

for additional

ppm

constituents

The constituent compositions based upon ( ) attached data or ( ) knowledge of the waste

TABLE CCWE-CONSTITUENT IN WASTE EXTRACT

	Concentration (in mg/l)
F001-F005 spent solvents	SPENT SOLVENT WASTE
Acetone.....	
n-Butyl alcohol.....	
Carbon disulfide.....	
Carbon tetrachloride.....	
Chlorobenzene.....	
Cresols (and cresylic acid).....	
Cyclohexanone.....	
1,2-Dichlorobenzene.....	
Ethyl acetate.....	
Ethylbenzene.....	
Ethyl ether.....	
Isobutanol.....	
Methanol.....	
Methylene chloride.....	
Methylene chloride (from the phar- maceutical industry).....	
Methyl ethyl ketone.....	
Methyl isobutyl ketone.....	
Nitrobenzene.....	
Pyridine.....	
Tetrachloroethylene.....	
Toluene.....	
1,1,1-Trichloroethane.....	
1,1,2-Trichloro-1,2,2- Trifluoroethane.....	
Trichloroethylene.....	
Trichlorofluoromethane.....	
Xylene.....	

EPA

ID#: ILD075603886

Generator Name SUN CHEMICAL CORPORATION

Generator Representative Signature \_\_\_\_\_

Name & Title of Representative \_\_\_\_\_

(print or type)

(-63-A)

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO \_\_\_\_\_  
 DESIGNATED \_\_\_\_\_  
 FACILITY: \_\_\_\_\_

EPA ID NO. \_\_\_\_\_

Under manifest number \_\_\_\_\_ the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator is hereby providing notice that the waste is restricted and the appropriate treatment standards (from Table CCWE of 40 CFR 268.41) are as follows:

Constituent

Treatment Standard

_____	_____ ppm	Use reverse side
_____	_____ ppm	for additional
_____	_____ ppm	constituents

The constituent compositions based upon ( ) attached data or ( ) knowledge of the waste

TABLE CCWE-CONSTITUENT IN WASTE EXTRACT

	Concentration (in mg/l)	
	Wastewaters containing spent solvents	All other spent solvent wastes
F001-F005 spent solvents		
Acetone.....	0.05	0.59
n-Butyl alcohol.....	5.0	5.0
Carbon disulfide.....	1.05	4.81
Carbon tetrachloride.....	.05	.96
Chlorobenzene.....	.15	.05
Cresols (and cresylic acid).....	2.82	.75
Cyclohexanone.....	.125	.75
1,2-Dichlorobenzene.....	.65	.125
Ethyl acetate.....	.05	.75
Ethylbenzene.....	.05	.053
Ethyl ether.....	.05	.75
Isobutanol.....	5.0	5.0
Methanol.....	.25	.75
Methylene chloride.....	.20	.96
Methylene chloride (from the pharmaceutical industry).....	12.7	.96
Methyl ethyl ketone.....	0.05	0.75
Methyl isobutyl ketone.....	0.05	0.33
Nitrobenzene.....	0.66	0.125
Pyridine.....	1.12	0.33
Tetrachloroethylene.....	0.079	0.05
Toluene.....	1.12	0.33
1,1,1-Trichloroethane.....	1.05	0.41
1,1,2-Trichloro-1,2,2-Trifluoroethane.....	1.05	0.96
Trichloroethylene.....	0.062	0.091
Trichlorofluoromethane.....	0.05	0.96
Xylene.....	0.05	0.15

EPA

Generator Name \_\_\_\_\_ ID#: \_\_\_\_\_  
 Generator Representative Signature \_\_\_\_\_  
 Name & Title of Representative \_\_\_\_\_  
 (print or type)

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 09 1988

Mr. John W. McBurrows  
Sun Chemical Corp.  
3200 Festival Drive  
Kankakee, Illinois 60901

Re: Notice of Violation  
Sun Chemical Corp.  
ILD 075 603 886

Dear Mr. McBurrows:

Pursuant to a telephone conversation with you on May 9, 1988, I am sending you a copy of a waste notification statement and a copy of the corrected version of the November 7, 1986, Land Disposal Restrictions Final Rule. The notification statement enclosed is not an official United States Environmental Protection Agency (U.S. EPA) statement, but a statement that many other facilities are using and is found to be acceptable by U.S. EPA.

If you have any further questions, please contact me at (312) 886-6533.

Sincerely yours,

Sharon R. Travis  
IL/MI/WI Enforcement Program Section

Enclosures

5HS-12:STRAVIS:5-9-88:srt

Disk 3

## CONCURRENCES

SYMBOL							
SURNAME							
DATE	5/9/88	5/9/88					

APR 26 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. John W. McBurrows  
Sun Chemical Corp.  
3200 Festival Drive  
Kankakee, Illinois 60901

Re: Notice of Violation  
Sun Chemical Corp.  
ILD 075 603 886

Dear Mr. McBurrows:

On February 17, 1988, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The Land Disposal Restrictions for F001-F005 spent solvents became effective on November 8, 1986, (40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in violation of the following:

1. Failure to provide a separate written notice attached to the manifest for each shipment of F-solvent wastes with the U.S. EPA hazardous waste numbers, the applicable treatment standards, manifest number, and waste analysis data, where available, as required by Section 268.7(a)(1); and
2. Failure to revise the waste analysis plan to include 40 CFR Part 268 requirements in accordance with Section 265.13.

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected



- 2 -

and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Programs Section

Enclosure

cc: Harry Chappel, IEPA  
Glenn Savage, IEPA

## CONCURRENCES

SYMBOL							
SURNAME	O.R.	BR		P.E.D.			
DATE	7/24/88	4/21/88		7.25.88			

Ms. Barbara Ru ell (546-12)  
P-571 916 L 1

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

U.S.G.P.O. 153-506

PS Form 3800, June 1985

Sent to	Mr. John W. Burrows
Street and No.	3200 Festival Drive
P.O., State and ZIP Code	Kankakee, IL 60901
Postage	\$ .65
Certified Fee	.85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 1.40
Postmark or Date	APR 27 1988 USPO

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery  
↑(Extra charge)↑ ↑(Extra charge)↑

3. Article Addressed to: Mr. John W. Burrows Sun Chemical Corp. 3200 Festival Drive Kankakee, IL 60901	4. Article Number P 571 916 691 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Addressee X Susan Gladu	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent X	
7. Date of Delivery 4-28-88	

PS Form 3811, Mar. 1987

★ U.S.G.P.O. 1987-178-268

DOMESTIC RETURN RECEIPT



# INSPECTION REVIEW FORM

File 934

ID NO.: IL0075603886  
 FACILITY NAME: Sun Chemical Corporation  
 LOCATION: 200 Park Ave, NY/3200 Festival Drive  
Kankakee, Ill. 60901  
 OPERATION: G. T. TSD INSPECTOR: S E J  
 DATE OF INSPECTION: 7/21/82 TYPE OF INSPECTION: 1. CEI 2. CSI  
 NAME OF REVIEWER: L. Davis DATE: 11/10/82  
 COMPLIANCE STATUS: IN OUT NON-REG  
 VIOLATION CLASS: NONE I II III  
 ACTION: State sent warning letter 10/22/82

RECOMMENDED EPA ACTION: NONE MONITOR STATE LETTER ADM. COMPLAINT REFERRAL  
 DATE REFERRED TO UNIT CHIEF: \_\_\_\_\_  
 ASSIGNEE: \_\_\_\_\_ DATE ASSIGNED: \_\_\_\_\_

## ENFORCEMENT ACTIONS

TYPE	ENFORCEMENT ACTION		STATUS		PENALTY		STATE OR EPA	LINK	RESP. PERSON	ATTORNEY CODE
	ISSUED	DUE	CODE	DATE	ASSESS	COLLECT				
3	10/22/82	11/8/82	<u>X</u>	10/22/82			S	Idolol		



SUN CHEMICAL CORPORATION

135 WEST LAKE STREET  
NORTHLAKE, ILLINOIS 60164

MASSIE E. ODIOTTI  
VICE PRESIDENT

312-562-0550

August 11, 1983

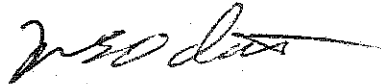
Ms. Rebecca Strom, Manager  
RCRA Activities  
US EPA Region 5  
P. O. Box 3587A  
Chicago, Illinois 60690-3587

Dear Ms. Strom:

This letter will serve as authorization for Mr.  
Gary M. Andrzejewski to sign for all Environmental  
and RCRA de-listing procedures.

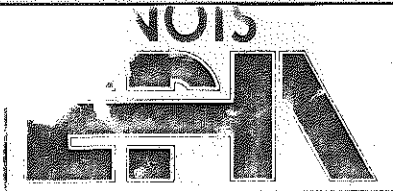
Should there be any questions, please do not hesitate in  
contacting my office.

Very truly yours,



M. E. Odiotti  
Vice President

MEO:je



# Environmental Protection Agency

1701 S. First Street Maywood, IL. 60153

# 934

312/345-9780

Refer to: 09105511 - Kankakee County - Kankakee/Sun Chemical  
ILD075603886

October 22, 1982

Sun Chemical Corporation  
P.O. Box 352  
3200 Festival Drive  
Kankakee, Illinois 60901

Attn: John McBurrows

Dear Mr. McBurrows:

On July 21, 1982, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of your facility in Kankakee, Illinois. The purpose of the inspection was to determine your facility's compliance with the Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111 1/2, pars. 1001 et seq., as amended, and regulations adopted by the Illinois Pollution Control Board. During the inspection the following apparent violations were observed:

The owner/operator is required to develop and follow a written waste analysis plan pursuant to 35 Ill. Adm. Code 725.113(b). The owner/operator was not able to provide such plan at the time of the inspection.

Pursuant to 35 Ill. Adm. Code 725.172 the owner/operator must keep a written operating record at the facility. The operating record must include the following:

- 1) A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I of 35 Ill. Adm. Code 725.173.
- 2) The location and quantity of each hazardous waste within the facility including cross-references to specific manifest document numbers.
- 3) Records and results of waste analyses and trial tests.
- 4) Summary reports and details of all incidents that require implementation of the contingency plan.
- 5) Records and results of inspections.
- 6) Monitoring and testing data.
- 7) All closure cost estimates and for disposal facilities all post-closure cost estimates.

Page 2

You are in apparent violation of 35 Ill. Adm. Code 725.173 for the following reasons: On site movement tickets which detailed location and quantity of wastes were not cross-referenced to specific manifest document numbers.

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the apparent violations described in this letter. Failure to correct these apparent violations may result in enforcement actions. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Mr. Jeff Stofferahn of my staff at the above number.

Sincerely,



Kenneth P. Bechely, Northern Region Manager  
Field Operations Section  
Division of Land Pollution Control

KPB:JAS:prb

Enclosure: Inspection Report

cc: Division File  
Northern Region  
U.S. E.P.A. - Region V

L P C F C O 5 5 C  
(1) (8) (9)

## OBSERVATION REPORT - SITE INVENTORY NO.

(11) (18)

CO. - L.P.C.

Region #

Date / /  
(20) (25)

Letter Sent (Yes or No) (26)

(Location) (Responsible Party)

Samples Taken: Yes ( ) No ( ) Time: From : : m

Ground Water( ) Surface( ) Other( ) To : : m

Photos Taken: Yes ( ) No ( ) Interviewed

Inspector (27) (29)

Previous Inspection Previous Correspondence Site Open: Yes( ) No( )

OPERATIONAL STATUS: TYPE OF OPERATION: AUTHORIZATION:

Operating (x) Landfill ( ) Storage ( ) E.P.A. Permit (x)

Temporarily Closed ( ) Random Dump ( ) Salvage ( ) Variance ( )

Closed Not Covered ( ) Other (x) A.C.D. ( ) 21(e) ( )

Closed and Covered ( ) Quantity Received Daily(1-6) Board Order ( )

(30) Illegal (5) ( )  
(31)

IMPROVED

LPC 4 1/79 5,000

SAME

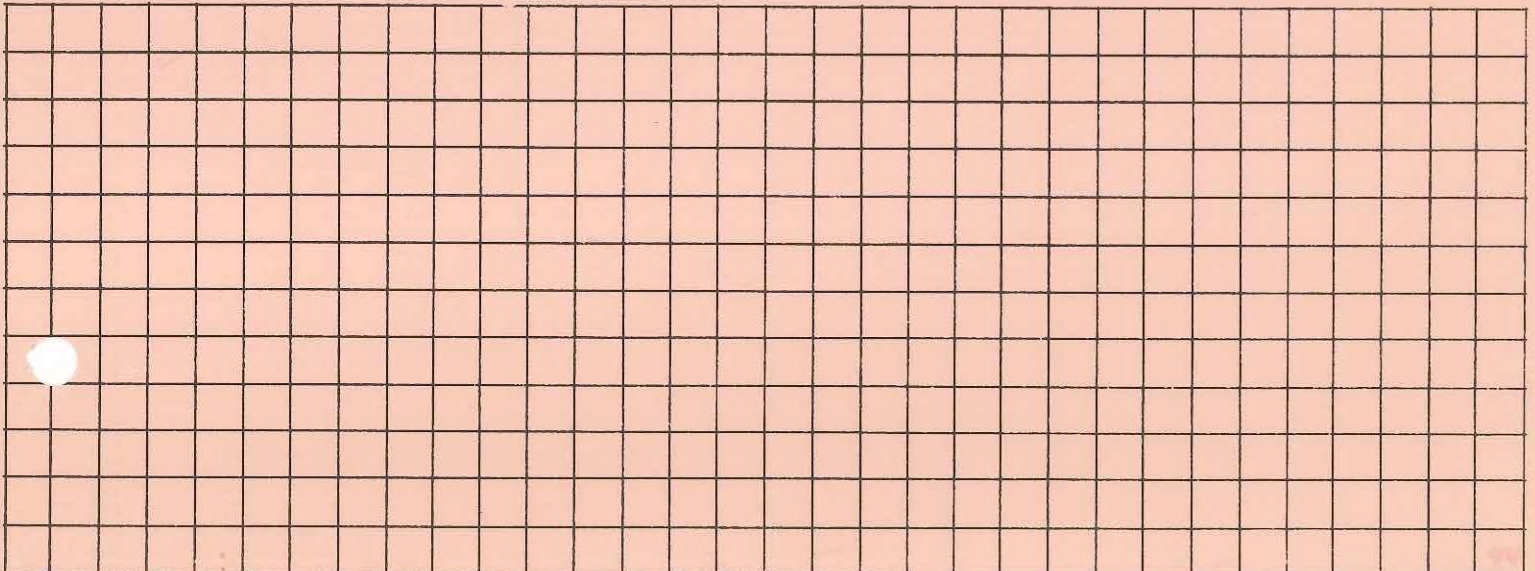
DETERIORATED

I S or D  
(62)

GENERAL REMARKS:

INTERVIEW: are

DIAGRAM:





NOTE: Pages

11-718, 21, 23

NOT APPLICABLE

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A - General Facility Standards

#934

I. General Information:

- (A) Facility Name: Sun Chemical Corp.  
(B) Street: 200 Park Avenue - Pan Am Bldg.  
(C) City: New York (D) State: New York (E) Zip Code: 10166  
(F) Phone: 212-986-5500 (G) County:         
(H) Operator: Sun Chemical Corp.  
(I) Street: 3200 Festival Drive  
(J) City: Kantakee (K) State: IL (L) Zip Code: 60901  
(M) Phone: 815 939-0136 (N) County: Kantakee  
(O) Owner: Sun Chemical Corp.  
(P) Street: 200 Park Avenue  
(Q) City: New York (R) State: New York (S) Zip Code:         
(T) Phone: 212-986-5500 (U) County:         
(V) Date of Inspection: 7/21/82 (W) Time of Inspection (From) 10:15am (To) 12:30pm  
(X) Weather Conditions: clear ~ 80° dry

cc: USEPA  
IEPA-N.R.  
SUN CHEM.

(Y)	Person(s) Interviewed	Title	Telephone
	<u>John McBurrows</u>	<u>Plant Manager</u>	<u>815-939-0136</u>
	<u>Michael Shoven</u>	<u>Plant Engineer</u>	<u>815-939-0136</u>
(Z)	Inspection Participants	Agency/Title	Telephone
	<u>Jeff Stefferuhn</u>	<u>IEPA / EPS</u>	<u>312-345-9780</u>
(AA)	Preparer Information		
	Name	Agency/Title	Telephone
	<u>Jeff Stefferuhn</u>	<u>IEPA / EPS</u>	<u>312-345-9780</u>

## II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- |  |  |
|--|--|
| <p><input checked="" type="checkbox"/> A. Storage and/or Treatment</p> <p style="margin-left: 20px;">1. <u>Containers</u> (I)</p> <p style="margin-left: 20px;">2. Tanks (J)</p> <p style="margin-left: 20px;">3. Surface Impoundments (K)</p> <p style="margin-left: 20px;">4. Waste Piles (L)</p> <p><input type="checkbox"/> B. Land Treatment (M)</p> <p><input type="checkbox"/> C. Landfills (N)</p> | <p><input type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P)</p> <p><input type="checkbox"/> E. Chemical, Physical, and Biological Treatment (Q)</p> |
|--|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS  
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
2. Facility expansion?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	A written plan is not available
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	waste prior to shipment is spot checked
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	24 hr shift & always supervision on site
2. Artificial or natural barrier around facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	fence & gate
3. Controlled entry?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	" "
4. Danger sign(s) at entrance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
2. Records of operator error?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
3. Records of discharges?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A

Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	drums checked - daily fire equip. gen. building cond - weekly
5. Safety, emergency equipment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	fire protection - weekly extinguishers - monthly (outside firm)
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	checked monthly - ADT Company
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	training received June 1980 - full plant safety program also regular program offered by Fire Dept.
6. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

\*Not Inspected



IV. PREPAREDNESS AND PREVENTION:  
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes No NI\* Remarks

— X —

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?

X — —

bell alarm on risers (water supply → sprinklers activation → internal pagers - hooked up to phones / loudspeakers through our plant intercom)

2. Telephone or 2-way radios at the scene of operations?

X ~~NI~~ —

telephones

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X — —

Absorbal, various fire protection systems as noted above

Indicate the volume of water and/or foam available for fire control:

\* internal sprinklers hooked to  
city water supply

(C) Testing and Maintenance of Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

X — —

various fire equip checked in house - weekly  
extinguishers - monthly by outside firm

2. Is emergency equipment maintained in operable conditions?

X — —

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

X ~~NI~~ —

pull alarms, phones

(E) Is there adequate aisle space for unobstructed movement?

X                    

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:  
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes    No    NI\*    Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X                    

2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X                    

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X                    

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

X                    

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X                    

*evacuation routes also posted throughout plant*

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A

# VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	see p 19
2. Are records of past shipments retained for 3 years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

not Inspected

## (C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

X

2. Does the operating record contain the following information:

- \*\*b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

X

- c. The location and quantity of each hazardous waste within the facility?

X

- \*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

NT

on-site movement tickets detail when barrels moved to storage area, manifests indicate when drums shipped off site, however tickets and manifests presently not cross-referenced, as required by 225.173(b2)

N/AN/A

\*\* See page 33252 of the May 19, 1980, Federal Register.

\*\*\* Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE  
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<u>X</u>	—	—	—
2. Has this plan been submitted to the Regional Administrator	—	—	<u>NI</u>	—
3. Has closure begun?	—	<u>X</u>	—	—
4. Is closure estimate available by May 19, 1981?	—	—	<u>NI</u>	—
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	—	—	—	<u>N/A</u>

VIII. FACILITY STANDARDS  
(Part 265, Subparts I thru R)

I  
USE AND MANAGEMENT OF CONTAINERS

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<u>X</u>	—	—	—
2. Are containers compatible with waste in them?	<u>X</u>	—	—	<u>steel drums DOT approved</u>
3. Are containers stored closed?	<u>X</u>	—	—	—
4. Are containers managed to prevent leaks?	<u>X</u>	—	—	<u>reconditioning of 'pumpable' drums for reuse, -testing of these to insure <del>the</del> good condition by reconditioner</u>
5. Are containers inspected weekly for leaks and defects?	<u>X</u>	—	—	<u>shift supervisors check daily</u>
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<u>X</u>	—	—	<u>ignitable</u>

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	N/A
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	---	---	---	N/A

J  
TANKS N/A

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	---	---	---	_____
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	---	---	---	_____
3. Do continuous feed systems have a waste-feed cutoff?	---	---	---	_____
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	---	_____
5. Are required daily and weekly inspections done?	---	---	---	_____
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	_____
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	_____

\*Not Inspected

Yes No NI\* Remarks

3. Has the owner or operator addressed the waste analysis requirements of 265.402?

\_\_\_\_\_

4. Are inspection procedures followed according to 265.403?

\_\_\_\_\_

5. Are the special requirements fulfilled for ignitable or reactive wastes?

\_\_\_\_\_

6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)

\_\_\_\_\_

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

# IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

## 1. MANIFEST REQUIREMENTS

Yes No NI\* Remarks

(A) Does the operator have copies of the manifest available for review?

X \_\_\_\_\_

(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)

1. Manifest document number?

X \_\_\_\_\_

2. Name, mailing address, telephone number, and EPA ID Number of Generator

X \_\_\_\_\_



	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<u>X</u>	—	—	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>X</u>	—	—	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	—	—	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	—	—	_____
7. Required certification?	<u>✓</u>	—	—	_____
8. Required signatures?	<u>X</u>	—	—	_____
(C) Does the owner or operator submit exception reports when needed?	—	—	—	<u>N/A</u>

## 2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<u>X</u>	—	—	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<u>X</u>	—	—	_____
(C) If required, are placards available to transporters of hazardous waste?	—	—	<u>X</u>	_____



VI. RECORDKEEPING and REPORTING  
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<u>  </u>	<u>  </u>	<u>  </u>	<u>N/A</u>

VII. INTERNATIONAL SHIPMENTS  
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	<u>  </u>	<u>X</u>	<u>  </u>	<u>N/A</u>
--	-----------	----------	-----------	------------

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	<u>  </u>	<u>  </u>	<u>  </u>	<u>N/A</u>
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	<u>  </u>	<u>  </u>	<u>  </u>	<u>"</u>
c. Met the Manifest requirements?	<u>  </u>	<u>  </u>	<u>  </u>	<u>"</u>
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	<u>  </u>	<u>  </u>	<u>  </u>	<u>"</u>

## REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Facility manufactures ~~printing~~ printing inks.

Two waste types are produced: liquid ~~waste~~ waste ink and solid waste ink. Both are actually the same waste, the liquid will solidify if solvents contained within are allowed to volatalize.

All wastes stored in drums. Liquid waste ink is pumped from the drums into a bulk tanker for shipment off site. These drums are then reused after reconditioning.

Drum storage area appears in good order.

### Violations of Interim Status Standards:

A detailed waste analysis plan was not available at the facility.

On site movement tickets and manifests track wastes, but unfortunately were not cross referenced at this time as required by 35 Ill Adm Code 725.172.

**D. Corrective  
Action**

YE

## CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Mary Wojciechowski

Date: September 21, 1992

### Background Facility Information

Facility Name: Sun Chemical Corporation

EPA Identification No.: ILD 075 603 886

Location (City, State): Kankakee, Illinois

Facility Priority Rank: Moderate

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

Entire facility

6 SWMUs

2 AOCs

### Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

☐ No corrective action activities initiated (Go to 5)

☒ RCRA Facility Assessment (RFA) or equivalent completed

☐ RCRA Facility Investigation (RFI) underway

☐ RFI completed

☐ Corrective Measures Study (CMS) completed

☐ Corrective Measures Implementation (CMI) begun or completed

☐ Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

☐ Operating permit

☐ Post-closure permit

☐ Enforcement order

☐ Other (Explain)

Corrective actions have not been initiated.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

☐ Yes

☐ No

☐ Uncertain; still underway

☒ Not required

Additional explanatory notes:

Interim measures have not been formerly required. However, corrective action will be needed to remediate contaminated on-site soil. This will most likely take place under RCRA closure and state UST regulations.

## Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

☒ Ground water  
☐ Surface water  
☐ Air  
☒ Soils

6. Are contaminant releases migrating off-site?

☐ Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:

Surface water:

Air:

Soils:

☐ No  
☒ Uncertain

- 7a. Are humans currently being exposed to contaminants released from the facility?

☐ Yes (Go to 8a)  
☐ No  
☒ Uncertain

Additional explanatory notes:

It is not known if contaminants have migrated off site.

- 7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

☒ Yes  
☐ No  
☐ Uncertain

Additional explanatory notes:

Ground water is used for water supply purposes in the region.

- 8a. Are environmental receptors currently being exposed to contaminants released from the facility?

☐ Yes (Go to 9)  
☐ No  
☒ Uncertain

Additional explanatory notes:

It is not known if contaminants have migrated off site.

- 8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

☒ Yes  
☐ No  
☐ Uncertain

Additional explanatory notes:

Ground water is used for regional water supply and there is a wetland within 1/2 mile.

### Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

☐ Yes  
☒ No  
☐ Uncertain

Additional explanatory notes:

Final corrective measures have not been identified or planned.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

☐ Yes  
☐ No  
☒ Uncertain

Additional explanatory notes:

Cleanup of 1 contaminated area will take place as part of RCRA closure. The need for cleanup in two other areas will be determined when soil sample results are received.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

☐ Yes  
☐ No  
☒ Uncertain

Additional explanatory notes:

Cleanup of 1 contaminated area will take place as part of RCRA closure. The need for cleanup in two other areas will be determined when soil sample results are received.

### Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

☒ Solid  
☒ Light non-aqueous phase liquids (LNAPLs)  
☐ Dense non-aqueous phase liquids (DNAPLs)  
☐ Dissolved in ground water or surface water  
☐ Gaseous  
☐ Other \_\_\_\_\_

13. Which of the following major chemical groupings are of concern at the facility?

☒ Volatile organic compounds (VOCs) and/or semi-volatiles  
☐ Polynuclear aromatics (PAHs)  
☐ Pesticides  
☐ Polychlorinated biphenyls (PCBs) and/or dioxins  
☐ Other organics  
☒ Inorganics and metals  
☐ Explosives  
☐ Other \_\_\_\_\_



14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

(X) Yes; Indicate possible course of action.

Removal of contaminated soil would be an appropriate course of action. Further stabilization may be necessary pending further investigation.

( ) No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

( ) Yes  
(X) No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

( ) Yes  
(X) No

#### Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

(X) Yes  
( ) No  
( ) Uncertain

Additional explanatory notes:

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

(X) Yes  
( ) No  
( ) Uncertain

Additional explanatory notes:



**Conclusion**

18. Is this facility an appropriate candidate for stabilization activities?

- ☒ (X) Yes
- ☐ ( ) No, not feasible
- ☐ ( ) No, not required
- ☒ (X) Further investigation necessary

Explain final decision, using additional sheets if necessary.

The following information was obtained from a July 2, 1992, PA/VSI report by PRC.

The facility has had one documented release to soil discovered during RCRA closure of a hazardous waste storage area. Removal of contaminated soil is an appropriate stabilization and will probably take place as part of RCRA closure.

Removal of contaminated soils may also be needed in two UST areas which used to store diesel fuel and oil. Pending receipt of soil sample results.

Further investigation, such as ground-water sampling, may warrant stabilization in addition to the above.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

November 5, 1992

Mr. Mike Shoven  
Sun Chemical Corporation  
3200 Festival Drive  
Kankakee, IL 60901

Re: Visual Site Inspection  
Sun Chemical Corporation  
Kankakee, Illinois  
ILD 075 603 886

Dear Mr. Shoven:

As indicated in the letter of introduction sent to you on May 13, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Kevin M. Pierard".

Kevin M. Pierard, Chief  
Minnesota/Ohio Technical Enforcement Section  
RCRA Enforcement Branch



**U.S. Environmental Protection Agency**  
Office of Waste Programs Enforcement  
Contract No. 68-W9-0006



# **TES 9**

**Technical Enforcement Support  
at Hazardous Waste Sites  
Zone III  
Regions 5,6, and 7**

**prc**

**PRC Environmental Management, Inc.**

**ILD 075 603 886**

PRC Environmental Management, Inc.  
233 North Michigan Avenue  
Suite 1621  
Chicago, IL 60601  
312-856-8700  
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/  
VISUAL SITE INSPECTION**

**SUN CHEMICAL CORPORATION  
KANKAKEE, ILLINOIS  
ILD 075 603 886**

**FINAL REPORT**

**Prepared for**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Programs Enforcement  
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 075 603 886
Date Prepared	:	September 8, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087-IL6S
Prepared by	:	Resource Applications, Inc. (Laura Czajkowski)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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### Attachment

- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES

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## 1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for the Sun Chemical Corporation, General Printing Ink Division (Sun Chemical) facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.



An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Sun Chemical facility (EPA Identification No. ILD 075 603 886) in Kankakee, Illinois. The PA was completed on May 20, 1992. RAI gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. RAI also reviewed relevant documentation from U.S. Department of Agriculture (USDA), U.S. Department of Commerce (USDC), U.S. Department of Interior (USDI), U.S. Geological Survey (USGS), National Oceanic and Atmospheric Administration (NOAA), and the Federal Emergency Management Agency (FEMA). The VSI was conducted on May 22, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. RAI identified six SWMUs and two AOCs at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and 10 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

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## EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Sun Chemical Corporation, General Printing Ink Division (Sun Chemical) facility in Kankakee, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The Sun Chemical facility manufactures commercial printing inks. The primary waste streams generated at the Sun Chemical facility are waste inks and solvents (D001, D007, F003, F005), waste ink heels (D001, F005), solidified resin (F005), nonhazardous wastewater, nonhazardous spent filter cartridges, and nonhazardous baghouse dust. The facility has operated at its current location since 1974 and employs about 60 people. The facility consists of one large building that is 24,000 square feet. The product aboveground storage tanks are located on the south side of the facility. A garage is located on the west side of the facility. A parking lot is located on the north side of the facility. Currently, Sun Chemical stores hazardous waste for less than 90 days at the Hazardous Waste Storage Area (SWMU 3) in 55-gallon steel drums. The facility's regulatory status is a large-quantity generator of hazardous waste.

Sun Chemical is currently going through RCRA closure for the Former North Hazardous Waste Storage Area (SWMU 5) and for the Former South Hazardous Waste Storage Area (SWMU 6). The units stored hazardous waste for greater than 90 days.

During closure activities for the Former South Hazardous Waste Storage (SWMU 6), soil analyses indicated the presence of cyanide, chromium, and lead contamination. IEPA has not determined if the cyanide contamination was a false positive or that there is cyanide contamination. Remediation of the area has not been started as of June 1992. Soil sampling during closure activities for the Former North Hazardous Waste Storage Area (SWMU 5) determined no remediation activities

were necessary. Facility representatives anticipate that closure of SWMUs 5 and 6 will be complete by the end of 1992.

On May 15, 1992, two 30,000-gallon underground storage tanks (USTs) were removed at the Sun Chemical facility. One UST contained diesel fuel and was located on the west side of the facility, while the other UST was located on the east side of the plant. Facility representatives suspect the diesel fuel UST of leaking. A diesel fuel odor was detected in the soil surrounding the tank. The area of the diesel fuel UST is AOC 1. Soil samples were taken in the area and the facility is awaiting the results. The other 30,000-gallon UST removed on May 15, 1992, stored oil. The soil around this UST appeared clean and did not have an odor. The area of the oil UST is AOC 2. Soil samples around the area were also taken. The facility is awaiting the results.

The PA/VSI identified the following six SWMUs and 2 AOCs at the facility:

**Solid Waste Management Units**

1. Hazardous Waste Satellite Accumulation Area
2. Nonhazardous Waste Storage Area
3. Hazardous Waste Storage Area
4. Wastewater Storage Tank
5. Former North Hazardous Waste Storage Area
6. Former South Hazardous Waste Storage Area

**RELEASED**  
DATE 9/17/00  
RIN #           
INITIALS WV

**Areas of Concern**

1. Area of the Diesel Fuel UST
2. Area of the Oil UST

The nearest ground water well is located 3 miles southeast of the facility. The facility receives its water from the Consumer Illinois Water Company. Water is drawn from the Kankakee River.

The nearest surface water body, Lake David, is located 0.1 mile north of the facility and is not used for agricultural, recreational, or municipal purposes.

The nearest wetland is located 0.5 mile east of the facility. No other parks or sensitive environments are located within 2 miles of the facility.

The nearest school, Kankakee Community College, is located about 2 miles south of the facility. Facility access is controlled by an 8-foot chain link fence with barbed wire. A south gate that allows railroad car entry is locked on the weekend.

The potential for release from all current units, except SWMU 1, to all environmental media is low. SWMU 1 has a medium potential for release to air. The 55-gallon drum of solidified resin (F005) was observed to be open during the VSI. SWMU 4 manages nonhazardous wastewater in a ten year old UST. The unit has never had tank integrity testing.

SWMU 5 had a low to moderate potential for release to ground water, surface water, and on-site soils. The unit was located outdoors on an asphalt pad. Drums were stored closed, so the potential for release to air was low. Soil sampling results from May 1989 were below cleanup levels.

Soil sampling performed on May 14 and 15, 1989 revealed soil contamination of cyanide, cadmium, chromium, and lead at SWMU 6. The release potential for ground water and surface water was low to moderate, since drums were stored on an asphalt pad. Drums were stored closed, so the release potential to air was low.

RAI recommends that the facility store the accumulation drum closed and properly date the drums in SWMU 3. RAI recommends tank integrity testing for SWMU 4. RAI also recommends that the facility pursue RCRA closure for both SWMUs 5 and 6 until IEPA approves closure of the units. For AOCs 1 and 2, if the soil analysis reveals contamination, RAI recommends remediation of the area following IEPA's guidelines.

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DATE 9/7/89  
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INITIALS UV

## 2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history, environmental setting; and receptors.

### 2.1 FACILITY LOCATION

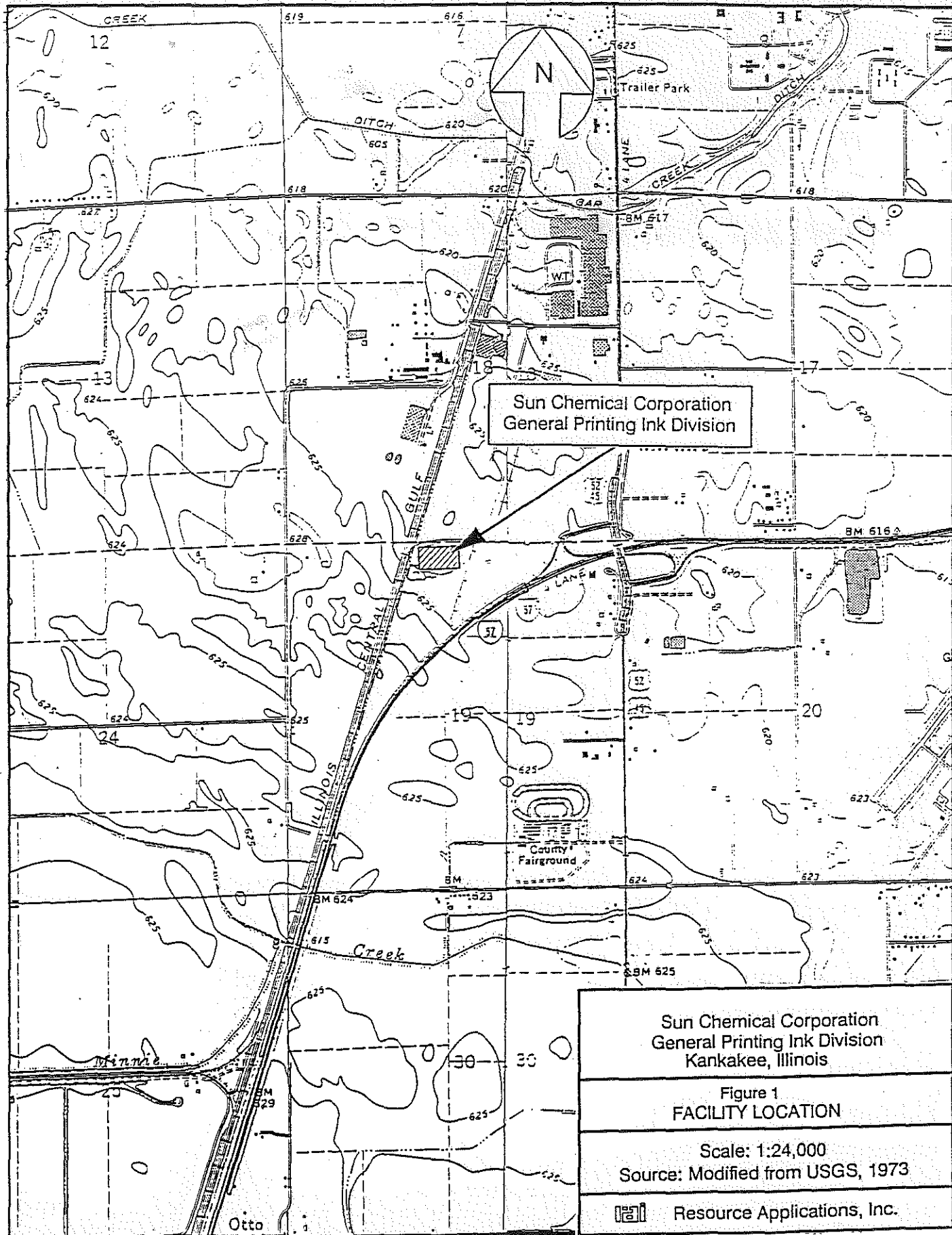
The Sun Chemical facility is located at 3200 Festival Drive in Kankakee, Kankakee County, Illinois (latitude 41° 04' 44" N and longitude 87° 52' 19" W) as shown in Figure 1. The facility occupies 35 acres in an industrial/agricultural area.

The Sun Chemical facility is bordered on the north by agricultural land, on the west by agricultural land, on the south by industry, and on the east by agricultural land.

### 2.2 FACILITY OPERATIONS

The Sun Chemical facility manufactures commercial printing inks. In manufacturing the inks, solvent and varnish are added to pigment. The materials are mixed and then piped through the shot mill and separators. The ink is then piped to blending tanks where the particular viscosity is obtained. The ink is then filtered again and piped to storage tanks. Sun Chemical manufactures black, red, blue, and yellow inks. There is also a quality control laboratory located at the facility. Laboratory samples of inks are analyzed and then recycled back into the process of manufacturing black ink. Product solvent and varnish are stored outside in four 30,000-gallon steel aboveground storage tanks (AST). Another 30,000-gallon product AST is to be installed in 1992. Raw material pigments are stored inside the facility in bags.

The facility has operated at its current location since 1974 and employs about 60 people. The facility consists of one large building that is 24,000 square feet. The facility also has a baghouse dust collection system located on the southeast side of the main building. The product AST are located on the south side of the facility. A garage is located on the west side of the facility. A parking lot is located on the north side of the facility. Currently Sun Chemical stores hazardous waste inside 55-gallon steel drums for less than 90 days at the Hazardous Waste Storage Area (SWMU 3). Solidified





resin (F005) is accumulated at the Hazardous Waste Satellite Accumulation Area (SWMU 1). Previously, Sun Chemical stored hazardous waste for greater than 90 days at the Former North Hazardous Waste Storage Area (SWMU 5) and also at the Former South Hazardous Waste Storage Area (SWMU 6). Nonhazardous waste is stored at the Nonhazardous Waste Storage Area (SWMU 2). Nonhazardous wastewater is stored at the Wastewater Storage Tank (SWMU 4).

The main building was built in 1974. Before that the land was used for agricultural purposes. The manufacturing of inks has been the only production activity at this facility. Solid wastes generated from the facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

### 2.3 WASTE GENERATION AND MANAGEMENT

The primary waste streams generated at the Sun Chemical facility are waste inks and solvents (D001, D007, F003, F005), waste ink heels (D001, F005), solidified resin (F005), nonhazardous wastewater, nonhazardous spent filter cartridges, and nonhazardous baghouse dust. These wastes are generated during the production of commercial printing inks. Annual generation rates presented below are based on 1991 waste generation data.

Ink production consists of mixing pigment with varnish and solvent, and then blending and filtering it to a particular concentration and viscosity. Some of the pigments contain chromium. When the facility switches the production to a different color ink the system needs to be cleaned. This process generates waste inks and solvents (D001, D007, F003, F005) from cleaning the system. This waste is put into 55-gallon steel drums and then stored in the Hazardous Waste Storage Area (SWMU 3). A solid form of this waste is also generated if the solvents volatilize. The solid waste inks and solvents (D001, D007, F003, F005) are also stored in SWMU 3. About 5,000 gallons of the solid and liquid waste are generated annually. In the past, the liquid waste ink and solvent were stored in the Former North Hazardous Waste Storage Area (SWMU 5). The solid waste ink and solvent were stored in the Former South Hazardous Waste Storage Area (SWMU 6). This waste is transported off site to Pollution Control Industries of Indiana, Inc. (PCI) of East Chicago, Indiana.

Waste ink heels (D001, F005) are also generated during the cleaning of the magnetic separators. This waste is stored in SWMU 3. About 13,600 gallons of this waste is generated annually. This waste is transported off site to PCI of East Chicago, Indiana.

During the cleaning of the sock filters in the production line, the air surrounding the unit comes into contact with product resin and generates a solidified resin (F005). This waste is accumulated in SWMU 1, the Hazardous Waste Satellite Accumulation Area, in 55-gallon steel drums. The waste is then transported to SWMU 3. About 2,500 gallons of solidified resin is generated annually. This waste is transported off site to PCI of East Chicago, Indiana.

The facility washes the floor in the production area. This process generates nonhazardous wastewater which is stored in SWMU 4, the Wastewater Storage Tank. The wastewater flows into floor grates that are connected to the 5,000-gallon steel AST. A sample of the wastewater is taken and analyzed before the waste is transported off site. About 30,000 gallons of this waste is generated annually. This waste is transported off site to PCI of East Chicago, Indiana.

Nonhazardous spent filter cartridges are generated about every 2 months. The filter cartridges are used to filter the ink during the manufacturing process. The spent cartridges are steamed to remove the solvent and then stored outside in SWMU 2, the Nonhazardous Waste Storage Area. The steamed solvent (D001) is placed in 55-gallon drums and transferred to the Hazardous Waste Storage Area (SWMU 3). The spent filter cartridges are stored in a 20-cubic-yard roll-off box (SWMU 2). Kankakee Industrial Disposal, a subsidiary of Waste Management, Inc. (KID) transports this waste to Kankakee Refuse Disposal Facility in Chebanse, Illinois.

In the past, petroleum naphtha was used in parts washers at the facility. In 1988, the facility contracted Safety-Kleen Corporation to service the parts washers. Safety-Kleen Corporation recycles the petroleum naphtha. Off-specification ink (D001) was generated when samples of product ink were taken. In 1990 this waste was no longer generated, since the facility now recycles the samples back into the production of black ink. Baghouse dust that is collected is also recycled back into the production of black ink.

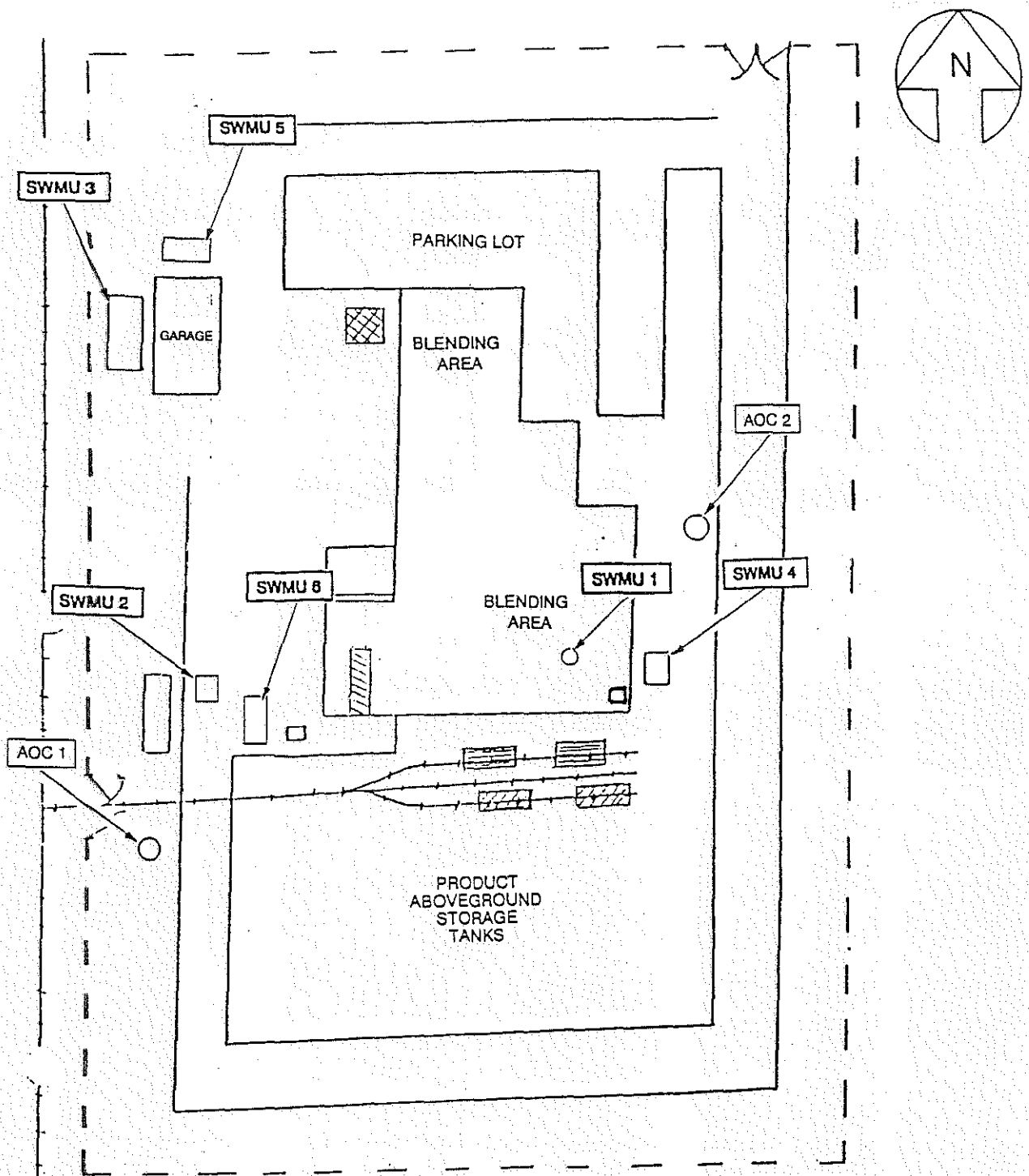
The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

TABLE 1  
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit<sup>a</sup></u>	<u>Status</u>
1	Hazardous Waste Satellite Accumulation Area	No	Active
2	Nonhazardous Waste Storage Area	No	Active
3	Hazardous Waste Storage Area	No	Active, less than 90 day storage
4	Wastewater Storage Tank	No	Active
5	Former North Hazardous Waste Storage Area	Yes	Inactive since 1988, currently undergoing RCRA closure
6	Former South Hazardous Waste Storage Area	Yes	Inactive since 1988, currently undergoing RCRA closure

Note:

<sup>a</sup> A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



**Solid Waste Management Unit (SWMU)**

1. Hazardous Waste Satellite Accumulation Area
2. Nonhazardous Waste Storage Area
3. Hazardous Waste Storage Area
4. Wastewater Storage Tank
5. Former North Hazardous Waste Storage Area
6. Former South Hazardous Waste Storage Area

**Areas of Concern (AOC)**

1. Area of the Diesel Fuel Underground Storage Tank
2. Area of the Oil Underground Storage Tank

Sun Chemical Corporation  
General Printing Ink Division  
Kankakee, Illinois

Figure 2  
FACILITY LAYOUT/SWMU AND AOC LOCATIONS

Scale: 1" = 85'

Source: Modified from SUN sketch  
received by RAI on May 22, 1992



Resource Applications, Inc.

TABLE 2  
SOLID WASTES

<u>Waste/EPA Waste Code<sup>a</sup></u>	<u>Source</u>	<u>Solid Waste Management Unit</u>
Waste inks and solvents/(D001, D007, F003, F005)	Manufacturing of ink	3 and 5
Solid waste inks and solvents/(D001, D007, F003, F005)	Manufacturing of ink	3 and 6
Waste ink heels/(D001, F005)	Cleaning of magnetic separators	3
Solidified resin/(F005)	Manufacturing of ink	1 and 3
Wastewater/NA	Floor washing	4
Spent filter cartridges/NA	Manufacturing of ink	2
Steamed solvent/(D001)	Cleaning of filter cartridges	3
Off-specification ink/(D001)	Sampling of ink	5

Notes:

<sup>a</sup> Not applicable (NA) designates nonhazardous waste.

## 2.4

### HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the Sun Chemical facility.

During closure activities for the Former South Hazardous Waste Storage Area (SWMU 6) soil sampling indicated the presence of cadmium, chromium, lead, and cyanide contamination. IEPA has not determined if the cyanide contamination was a false positive or that there is cyanide contamination. Cyanide is not used in the production process at Sun Chemical. In the past, Sun Chemical used a pigment that, when analyzed, can give a false positive for cyanide contamination. Facility representatives anticipate that closure of SWMUs 5 and 6 will be complete by the end of the 1992.

On May 15, 1992, two 30,000-gallon underground storage tanks (USTs) were removed at the Sun Chemical facility. A diesel fuel UST was removed from the west side of the facility. Facility representatives suspect the UST of leaking. A diesel fuel odor was detected in the soil surrounding the tank. This is AOC 1, the Area of the Diesel Fuel UST. Soil samples were taken in the area and the facility is awaiting the results. The other 30,000-gallon UST, located on the east side of the facility, stored oil. The soil around this UST appeared clean and did not have an odor. This area is AOC 2, the Area of the Oil UST. Soil samples around the area were also taken. The facility is awaiting the results. The diesel fuel UST was installed in 1976. The oil UST was installed in 1974.

There are no other documented releases.

## 2.5

### REGULATORY HISTORY

Sun Chemical submitted a Notification of Hazardous Waste Activity to EPA on August 12, 1980 (Sun Chemical, 1980a). The facility submitted a RCRA Part A permit application on November 19, 1980 (Sun Chemical, 1980b). This application listed the following process code and capacity: one (S01) Container Storage Unit with a 15,000 gallon capacity. The application listed the following wastes: F003, F005, D001, and D005.

The facility is currently closing SWMUs 5 and 6. Soil sampling performed on May 14 and 15, 1989 revealed contamination of cadmium, chromium, and lead at SWMU 6. Cyanide contamination was also detected at SWMU 6, and IEPA is determining if the cyanide results were a false positive. The facility is awaiting notification from IEPA on whether more sampling is required. Sun Chemical expects to close SWMUs 5 and 6 in 1992. The facility currently operates as a large-quantity generator and stores hazardous wastes for less than 90 days.

In the past, Sun Chemical has had RCRA compliance problems. The facility has had numerous inspections performed by IEPA which took place from 1982 through 1992 (IEPA, 1982, 1986a, 1986c, 1988a, 1988d, 1990a, 1990e, 1990f, and 1992a). Violations received pertained mainly to deficiencies in paperwork, such as training records, contingency plan, and land disposal restriction notifications, and also wastes management violations (IEPA, 1986b, 1988b, 1990b, 1992b; and EPA, 1988a). Sun Chemical has resolved all violations, and no compliance orders were issued (IEPA, 1986d, 1988c, 1988d, 1988e, 1988g, 1990c, 1990d, 1991a, 1992c and EPA, 1988b, 1990a, 1990b).

The facility is required by IEPA to have operating air permits for a boiler, No. 091804AAF that expires on June 20, 1993, and also for the facility, No. 091804AAF, that expires on November 19, 1996 (IEPA, 1988f and 1991b). The facility has no history of air permit compliance problems. The facility has no history of odor complaints from area residents.

The facility is not required to have a National Pollutant Discharge Elimination System (NPDES) permit. The facility is required by the Kankakee Metropolitan Water District (KMWD) to have a permit to discharge to the sanitary sewer system. This permit, No. WDP 015, expires on April 1, 1994 and requires testing of discharge twice a month for metals, solids, and pH.

## 2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.



### 2.6.1 Climate

The climate in Kankakee County is typically continental with cold winters, warm summers, and frequent short periods of fluctuations in temperature, humidity, cloudiness, and wind direction. The average daily temperature is 50.9°F. The lowest average daily temperature is 23.8°F in January. The highest average daily temperature is 74.0°F in July.

The total annual precipitation for the county is 33.84 inches (NOAA, 1975). The mean annual lake evaporation for the area is about 31 inches (USDC, 1968). The net annual precipitation is 2.84 inches. The 1-year, 24-hour maximum rainfall is 6.70 inches (Ruffner, 1978).

The prevailing wind direction is from the west. Average wind speed is highest in March at 11.8 miles per hour (Ruffner, 1978). The average wind speed is 10.3 miles per hour from a westerly direction (Ruffner, 1978).

### 2.6.2 Flood Plain and Surface Water

The Sun Chemical facility is located outside the 500-year flood plain (FEMA, 1979). The nearest surface water body, Lake David, is located 0.1 mile north of the facility. This lake was created in the late 1960's when Interstate 57 was built and fill material was needed. The lake is not used for recreational, industrial, or municipal purposes.

Surface water drainage at the facility is to the west towards the Illinois Central Gulf railroad tracks. However, the facility is located on level land so drainage is probably minimal. The storm water sewers at the facility discharge into a ditch located west of the facility, while the ditch discharges into Garr Creek before ultimately discharging into the Kankakee River. Discharge from the facility (excluding storm water) is to the KMWD sanitary sewer system.

### 2.6.3 Geology and Soils

The facility is underlain by Andres Silt loam soils and Reddick Clay loam soils. The Andres Silt loam soils are nearly level to gently sloping, poorly drained soils, formed on thin silty deposits and the underlying glacial till. The surface layer is a dark brown silt loam, and is underlain by silty

clay loam. Permeability is moderate and the available water capacity is high. The Reddick Clay loam soils are nearly level, poorly drained, moderately slow permeable unit with high available water capacity (USDA, 1979). The unconsolidated deposits, or drift, underlying the soil consist of clay, silt, and sand deposited by successive glacial advances and retreats. The predominant drift material in the area is thin loess on silty clay or loam underlain by Wisconsinian till (pebbly clay), or lacustrine sediments. No site specific information was available, but the drift may be up to 20 feet thick beneath the facility (Cravens, et al, 1990).

The uppermost bedrock underlying the facility is Silurian in age, and consists of fractured dolomites and dolomitic limestones of the Niagaran and Alexandrian series. These dolomitic beds form a major aquifer, confined on the upper boundary by the clayey drift units, and on the lower boundary by the Maquoketa Group of Ordovician age. The latter group consists of upper and lower units of shale with a middle unit of interbedded dolomite and limestone. Beneath the Maquoketa Group are deeper aquifers, such as the Galena-Platteville dolomites and Glenwood-St. Peter sandstones of Ordovician age, and the Cambrian Ironton-Galesville sandstones and Eau Claire dolomite shales and siltstones.

#### 2.6.4 Ground Water

The principal bedrock aquifer is the Silurian dolomite beds. Movement of ground water is principally due to secondary permeable solution cavities and joints. These openings occur chiefly in the upper 100 feet of bedrock. Recharge of the aquifer is derived primarily from the vertical leakage of ground water from the overlying drift deposits. Ground water flows laterally to discharge in streams and rivers.

The vast majority of the water wells in Kankakee County are completed in Silurian dolomite bedrock, with the remainder drilled into sand and gravel. The deeper Ordovician aquifers are not an important source of ground water in the region, as the Maquoketa shale acts as an aquitard, hindering recharge of the deep aquifer.

Irrigation accounted for an estimated 63 percent of ground water used in Kankakee County in 1987. Public water supply account for 15 percent, domestic pumpage was 17 percent, industrial use was 1 percent, and livestock pumpage was 2 percent (Cravens, et al, 1990).

The Sun Chemical facility occupies 35 acres in an industrial area in Kankakee, Illinois. Kankakee has a population of about 103,000 people.

The Sun Chemical facility is bordered on the north by agricultural land, on the west by agricultural land, on the south by industry, and on the east by agricultural land. The nearest school, Kankakee Community College, is located about 2 miles south of the facility. Facility access is controlled by an 8-foot chain link fence with barbed wire. A south gate that allows railroad car entry is locked on the weekend.

The nearest ground water well is located 3 miles southeast of the facility. The facility receives its water from the Consumer Illinois Water Company. Water is drawn from the Kankakee River.

The nearest surface water body, Lake David, is located 0.1 mile north of the facility and is not used for agricultural, recreational, or municipal purposes.

The nearest wetland classified as Palustrine emergent, seasonally flooded, excavated, is located 0.5 mile east of the facility. Another wetland classified as Palustrine emergent, temporarily flooded, farmed is located 1 mile west of the facility. No other parks or sensitive environments are located within 2 miles of the facility (USDI, 1981).

### 3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the six SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI's observations. Figure 2 shows the SWMU locations.

#### **SWMU 1**

#### **Hazardous Waste Satellite Accumulation Area**

**Unit Description:**

The Hazardous Waste Satellite Accumulation Area is located indoors on the east side of the facility and is underlain by a 6-inch-thick concrete pad. The unit is a 55-gallon steel drum that accumulates solidified resin (F005). The unit measures 2 feet by 5 feet.

**Date of Startup:**

This unit began operation in the 1980s.

**Date of Closure:**

This unit is active.

**Wastes Managed:**

This unit manages solidified resin (F005) in a 55-gallon steel drum. Wastes from this unit are ultimately stored at SWMU 3.

**Release Controls:**

The unit is located indoors, on a 6-inch-thick concrete pad. There are no floor drains in the area.

**History of  
Documented Releases:**

No releases from this unit have been documented.

**Observations:**

The unit contained one 55-gallon drum of solidified resin (F005) during the VSI. The drum was observed to be open. No cracks were visible in the concrete floor (see Photograph No. 1).

## **SWMU 2**

### **Nonhazardous Waste Storage Area**

**Unit Description:** The Nonhazardous Waste Storage Area is located outdoors on the west side of the facility. The unit is a 20-cubic-yard roll-off box that stores nonhazardous spent filters. The unit is located on an asphalt pad and measures 10 feet by 20 feet (see Photograph No. 2).

**Date of Startup:** This unit began operation in the 1980s.

**Date of Closure:** This unit is active.

**Wastes Managed:** This unit manages nonhazardous spent filter cartridges in a 20-cubic-yard roll-off box.

**Release Controls:** The unit contains spent filter cartridges in a roll-off box and is underlain by an asphalt pad.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** The unit contained about 20 spent filter cartridges, in a 20-cubic-yard roll-off box during the VSI (see Photograph Nos. 2 and 3). RAI noted no evidence of release.

## **SWMU 3**

### **Hazardous Waste Storage Area**

**Unit Description:** The Hazardous Waste Storage Area is located outdoors, on the west side of the facility. The unit stores hazardous waste for less than 90 days in 55-gallon steel drums. The unit measures 85 feet by 50 feet and is made of an 8-inch thick concrete pad. The unit has a 5-foot wall surrounding the north, west, and south sides of the unit. The concrete pad slopes to the east to contain spills.

**Date of Startup:** This unit began operation in 1988.

**Date of Closure:** This unit is active.

**Wastes Managed:** This unit manages waste inks and solvents (D001, D007, F003, F005), solid waste inks and solvents (D001, D007, F003, F005), waste ink heels (D001, F005), steamed solvent (D001), and solidified resin (F005) in 55-gallon steel drums.

**Release Controls:** The unit has an 8-inch-thick concrete pad with the east edge of the pad sloping up. The unit has a 5-foot wall surrounding the north, west, and south sides of the pad. There are no drains located in the area.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** The unit contained seven full 55-gallon drums of solid waste inks and solvents (D001, D007, F003, F005) and 38 empty drums during the VSI. Two hairline cracks were present in the concrete pad on the east side. Some staining was present on the concrete pad. The staining was not near the cracks. Three drums were not dated (see Photographs No. 4 and 5).

#### **SWMU 4**

#### **Wastewater Storage Tank**

**Unit Description:** The Wastewater Storage Tank is located outdoors and underground on the east side of the facility. The unit is a 5,000-gallon steel UST that collects the floor washing of the facility. A trench system throughout the facility channels the wastewater to the unit.

**Date of Startup:** This unit began operation in 1982.

**Date of Closure:** This unit is active.

Wastes Managed:	This unit manages nonhazardous wastewater generated from floor washing.
Release Controls:	The unit has no release controls.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit is labeled as hazardous waste. The unit was labeled as such until results of TCLP testing indicated the wastewater to be nonhazardous. The area above the unit has gravel around the edges and then vegetation (see Photograph No. 6).
SWMU 5	Former North Hazardous Waste Storage Area
Unit Description:	The Former North Hazardous Waste Storage Area is located outdoors on the north side of the facility on an asphalt pad. The unit stored waste inks and solvents (D001, D007, F003, F005) and off-specification ink (D001) in 55-gallon steel drums located on gravel for greater than 90 days. The unit measures 80 feet by 30 feet and currently stores raw material.
Date of Startup:	This unit began operation in 1980.
Date of Closure:	This unit stopped managing hazardous waste in 1988. The unit is currently undergoing RCRA closure.
Wastes Managed:	This unit managed waste inks and solvents (D001, D007, F003, F005) and off-specification ink (D001) in 55-gallon steel drums.
Release Controls:	The unit is located on an asphalt pad.



History of  
Documented Releases:

No releases from this unit have been documented.

Observations:

The unit contained product and wooden skids. No cracks were visible in the asphalt. No evidence of release was noted (see Photograph No. 7).

**SWMU 6**

**Former South Hazardous Waste Storage Area**

Unit Description:

The Former South Hazardous Waste Storage Area is located outdoors west of the facility. The unit stored solid waste inks and solvents (D001, D007, F003, F005) in 55-gallon steel drums for greater than 90 days. The unit measures 39 feet by 40 feet, with an asphalt surface.

Date of Startup:

This unit began operation in 1980.

Date of Closure:

This unit stopped managing waste in 1988. The unit is currently going through RCRA closure.

Wastes Managed:

This unit managed solid waste inks and solvents (D001, D007, F003, F005) in 55-gallon steel drums.

Release Controls:

The unit is located on an asphalt pad.

History of  
Documented Releases:

Soil sampling was performed on May 14 and 15, 1989 at the Sun Chemical facility. Soil sampling results showed contamination of cyanide, cadmium, chromium, and lead.

Observations:

The unit was empty during the VSI. No cracks were present in the asphalt pad. No evidence of release was noted (see Photograph No. 8).

#### 4.0 AREAS OF CONCERN

RAI identified two AOCs during the PA/VSI. These AOCs are discussed below; their locations are shown in Figure 2.

##### **AOC 1      Area of the Diesel Fuel UST**

In 1976, Sun Chemical installed a 30,000-gallon diesel fuel UST. In 1989 the facility stopped using the UST. On May 15, 1992, Sun Chemical removed the UST. During removal, an odor of diesel fuel was present in the soil in the area of the UST. Soil samples were taken during removal and the facility is awaiting the results.

##### **AOC 2      Area of the Oil UST**

In 1974, Sun Chemical installed 30,000-gallon fuel oil UST. In 1980, the facility stopped using UST. On May 15, 1992, the UST was removed and soil samples were taken. During the soil sampling soil appeared clean and no odor was detected. The UST had existed for more than 17 years prior to removal. The facility is waiting for the soil sampling results.

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified six SWMUs and two AOCs at the Sun Chemical facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOCs at the Sun Chemical facility and the recommended further actions.

### SWMU 1 Hazardous Waste Satellite Accumulation Area

**Conclusions:** The Hazardous Waste Satellite Area is located indoors. The unit accumulates solidified resin (F005) in a 55-gallon steel drum.

The unit has a low potential for release to ground water, surface water, and on-site soils. The unit is located indoors on a 6-inch-thick concrete pad. The release potential to air is medium. The satellite drum was observed open during the VSI.

**Recommendations:** RAI recommends that the facility store the drum closed in the unit.

### SWMU 2 Nonhazardous Waste Storage Area

**Conclusions:** The Nonhazardous Waste Storage Area is located outdoors on the west side of the facility. The unit stores nonhazardous spent filter cartridges in a 20-cubic-yard roll-off box on an asphalt pad.

The unit has a low potential for release to ground water, surface water, and on-site soils. There is a low potential of release to air because the spent filter cartridges are not volatile.

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**ENFORCEMENT  
CONFIDENTIAL**

Recommendations: RAI recommends no further action at this time.

**SWMU 3                      Hazardous Waste Storage Area**

Conclusions:                The Hazardous Waste Storage Area is located outdoors on the west side of the facility. The unit stores waste inks and solvents (D001, D007, F003, F005), solid waste inks and solvents (D001, D007, F003, F005), waste ink heels (D001, F005), and solidified resin (F005), all in 55-gallon steel drums.

The unit has a low potential for release to ground water, surface water, and on-site soils. The unit has an 8-inch thick concrete pad that slopes to the east to contain spills. There is also a 5-foot concrete wall surrounding the north, west, and south sides of the unit. Drums are stored closed, so the release potential to air is low.

Recommendations:        RAI observed 3 drums in the unit that did not have dates. RAI recommends the facility properly date all drums in the unit.

**SWMU 4                      Wastewater Storage Tank**

Conclusions:                The Wastewater Storage Tank is located underground on the east side of the facility. The unit is a 5,000-gallon steel UST that collects and stores the wastewater from washing the floors of the facility.

The unit has a low potential for release to ground water, surface water, on-site soils, and air. The unit is a steel UST and manages nonhazardous wastewater. The UST is ten years old and does not have a release history.

Recommendations:        RAI recommends integrity testing for the UST and to label the UST as nonhazardous.

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**SWMU 5****Former North Hazardous Waste Storage Area****ENFORCEMENT  
CONFIDENTIAL****Conclusions:**

The Former North Hazardous Waste Storage Area is located outdoors on the north side of the facility. The unit stored waste inks and solvents (D001, D007, F003, F005) and off-specification ink (D001) in 55-gallon drums, on an asphalt pad for greater than 90 days. The unit is currently undergoing RCRA closure.

The unit, which was located outdoors on an asphalt pad, had a low to moderate potential for release to ground water, surface water, and on-site soils. Drums were stored closed, so the potential for release to air was low. Soil sampling results from May 1989 were below clean-up levels.

**Recommendations:**

RAI recommends that Sun Chemical follow IEPA's direction in continuing RCRA closure of unit.

**SWMU 6****Former South Hazardous Waste Storage Area****Conclusions:**

The Former South Hazardous Waste Storage Area is located outdoors west of the facility. The unit stored solid waste inks and solvents (D001, D007, F003, F005) in 55-gallon steel drums for greater than 90 days.

Soil sampling performed on May 14 and 15, 1989 revealed soil contamination of cyanide, cadmium, chromium, and lead. The release potential for ground water, and surface water was low to moderate. Drums were stored closed, so the potential for release to air was low.

**Recommendations:**

RAI recommends Sun Chemical follow IEPA's direction in continuing RCRA closure and determining clean-up levels for soil. If remediation is necessary, the facility should follow guidelines determined by IEPA.

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**AOC 1****Area of the Diesel Fuel UST****Conclusions:**

The Area of the Diesel Fuel UST is located on the west side of the facility. In 1976, a 30,000-gallon UST was installed and used until 1989. On May 15, 1992, Sun Chemical removed the UST. During removal, an odor of diesel fuel was detected in the soil in the area of the UST. Soil samples were taken during removal and the facility is awaiting the soil sampling results.

**Recommendations:**

RAI recommends that if the soil sampling results reveal contamination above allowable limits, the facility should remediate the area under IEPA's direction.

**AOC 2****Area of the Oil UST****Conclusions:**

The Area of the Oil UST is located on the east side of the facility. Sun Chemical installed the 30,000-gallon UST in 1974. Sun Chemical used the UST to store fuel oil until 1980. On May 15, 1992, the UST was removed and soil samples were taken. The facility is waiting for sample results.

**Recommendations:**

RAI recommends that if the soil sampling results reveal contamination above allowable limits, the facility should remediate the area under IEPA's direction.

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TABLE 3  
SWMU AND AOC SUMMARY

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<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Hazardous Waste Satellite Accumulation Area	1980s to present	RAI observed an open satellite accumulation drum.	Store the satellite accumulation drum closed.
2. Nonhazardous Waste Storage Area	1980s to present	None	No further action at this time.
3. Hazardous Waste Storage Area	1988 to present	RAI observed stains on the concrete pad.	Properly date drums in the unit.
4. Wastewater Storage Tank	1982 to present	None	Tank integrity test and label the UST as nonhazardous waste.
5. Former North Hazardous Waste Storage Area	1980 to 1988	Soil sampling results were below clean up levels.	Complete RCRA closure of unit under IEPA's direction.
6. Former South Hazardous Waste Storage Area	1980 to 1988	May 14 and 15, 1989 soil sampling revealed contamination of soil with cyanide, cadmium, chromium, and lead.	If contamination is determined to be above allowable limits, remediate the area under IEPA's direction and complete RCRA closure of unit.

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TABLE 3 (CONT'D)

SWMU AND AOC SUMMARY

<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Area of the Diesel Fuel UST	1976 to 1989	Soil sampling was taken May 15, 1992, facility is awaiting results. Diesel fuel odor was detected in the soil during the removal of the UST.	RAI recommends if contamination is present, facility remediate the area under IEPA's direction.
2. Area of the Oil UST	1974 to 1980	Soil sampling was taken May 15, 1992, facility is awaiting results.	RAI recommends if contamination is present, facility remediate the area under IEPA's direction.

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- IEPA, 1986a. ISS-Treatment, Storage, and Disposal Inspection Report, May 2.
- IEPA, 1986b. Compliance Inquiry Letter to Sun Chemical, July 29.
- IEPA, 1986c. ISS-Treatment, Storage and Disposal Inspection Report, August 13.
- IEPA, 1986d. Letter to Sun Chemical stating violations from the July 29, 1986 Compliance Inquiry Letter have been resolved, September 4.
- IEPA, 1988a. RCRA Inspection Report, February 16.
- IEPA, 1988b. Pre-Enforcement Conference Letter to Sun Chemical, March 16.
- IEPA, 1988c. Pre-Enforcement Conference with Sun Chemical resolved four of the six violations, April 14.
- IEPA, 1988d. RCRA Inspection Report, April 15.
- IEPA, 1988e. Letter to Sun Chemical stating one violation out of the two from the July 29, 1986 Compliance Inquiry Letter has been resolved, June 9.
- IEPA, 1988f. Operating Permit for a boiler, No. 091804AAF issued by IEPA, June 21.
- IEPA, 1988g. Letter to Sun Chemical stating that the final violation from the March 16, 1988 Pre-Enforcement Conference letter has been resolved, August 10.
- IEPA, 1990a. Land Disposal Restriction Inspection Report, March 22.
- IEPA, 1990b. Pre-Enforcement Conference Letter to Sun Chemical, June 14.
- IEPA, 1990c. Letter to Sun Chemical stating that all violations except two, from the July 18, 1990 Pre-Enforcement Conference have been resolved, July 30.

IEPA, 1990d. Letter to Sun Chemical stating all violations have been resolved from the July 18, 1990 Pre-Enforcement Conference, August 7.

IEPA, 1990e. RCRA Inspection Report, August 9.

IEPA, 1990f. RCRA Follow-up Inspection Report, August 31.

IEPA, 1991a. Letter to Sun Chemical stating that the violations from the June 14, 1990 Pre-Enforcement Conference Letter, January 15.

IEPA, 1991b. Operating Permit for Sun Chemical facility, No. 091804AAF issued by IEPA, September 25.

IEPA, 1992a. RCRA Inspection Report, January 7.

IEPA, 1992b. Compliance Inquiry Letter to Sun Chemical, March 2.

IEPA, 1992c. Letter to Sun Chemical stating that the violations from the March 2, 1992 Compliance Inquiry Letter have been resolved, April 10.

National Oceanic and Atmospheric Administration (NOAA), 1975. Climate of Kankakee 3SW, Illinois. National Weather Center, Asheville, NC.

Ruffner, J.A., 1978. Climates of the States: Volume 1: Alabama - Montana. Gale Research Company, Detroit, MI.

Sun Chemical Corporation (Sun Chemical), 1980a. Notification of Hazardous Waste Activity, August 12.

Sun Chemical, 1980b. Hazardous Waste Part A permit application, November 19.

U.S. Department of Agriculture (USDA), 1979. Soil Survey of Kankakee County, Illinois. U.S. Government Printing Office, Washington D.C.

U.S. Department of Commerce (USDC), 1968. Climatic Atlas of the United States. U.S. Government Printing Office, Washington D.C.

U.S. Environmental Protection Agency (EPA), 1988a. Notice of Violation to Sun Chemical, April 26.

EPA, 1988b. Letter to Sun Chemical stating that the violations from the April 26, 1988 Notice of Violation have been resolved, June 9.

EPA, 1990a. Letter to Sun Chemical stating that three of the five violations from the July 3, 1990 Notice of Violation have been resolved, September 12.

EPA, 1990b. Letter to Sun Chemical stating that the final violations from the July 3, 1990 Notice of Violation have been resolved, September 24.

U.S. Geological Survey (USGS), 1973. Topographic Map for the West Kankakee Quadrangle and Kankakee Quadrangle, 7.5 Minute Series.

U.S. Department of Interior (USDI), 1981. National Wetlands Inventory Map: West Kankakee, Illinois Quadrangle.

**ATTACHMENT A**  
**EPA PRELIMINARY ASSESSMENT FORM 2070-12**



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE IL 02 SITE NUMBER ILD 075 603 886

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Sun Chemical Corporation		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 3200 Festival Drive			
03 CITY Kankakee	04 STATE IL	05 ZIP CODE 60901	06 COUNTY Kankakee	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 41 04 44.N		LONGITUDE 087 52 19.W			
10 DIRECTIONS TO SITE (Starting from nearest public road) Interstate 57 south exit at #308 go to stop sign and turn left. First stop light make another left and take that to Festival Drive. Make a left onto Festival Drive.					

III. RESPONSIBLE PARTIES

01 OWNER (if known) Sun Chemical Corporation		02 STREET (Business, mailing, residential) 222 Bridge Plaza South			
03 CITY Fort Lee	04 STATE NJ	05 ZIP CODE 07024	06 TELEPHONE NUMBER (201) 224-4600		
07 OPERATOR (if known and different from owner) Sun Chemical Corporation		08 STREET (Business, mailing, residential) 3200 Festival Drive			
09 CITY Kankakee	10 STATE IL	11 ZIP CODE 60901	12 TELEPHONE NUMBER (815) 939-0136		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. Notification DATE RECEIVED: 08 / 12 / 80 MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____ / ____ / ____ MONTH DAY YEAR <input type="checkbox"/> C. NONE					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 05 / 22 / 92 <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): Resource Applications, Inc.			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1974 Present BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN			

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED  
Wastes handled by Sun Chemical Corporation are: waste inks and solvents, waste ink heels, solidified resin, wastewater, spent filter cartridges, and baghouse dust.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION  
during removal of two 30,000-gallon Underground Storage Tanks (USTs) in May of 1992, an odor of diesel fuel was present in the soil at one of the USTs. Sun Chemical is awaiting soil sampling results. During closure of the Former Hazardous Waste Storage areas soil sampling performed in May 1989 revealed cyanide contamination. IEPA is determining whether remediation or more soil sampling is necessary. Currently there is a low potential of release from all SWMUs to environmental media at the site.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)  
☒ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time-available basis) ☐ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) EPA Region V		03 TELEPHONE NUMBER (312) 886-4448		
04 PERSON RESPONSIBLE FOR ASSESSMENT Laura Czajkowski	05 AGENCY	06 ORGANIZATION Resource Applications, Inc.	07 TELEPHONE NUMBER (312) 332-2230	08 DATE 05 / 20 / 92 MONTH DAY YEAR	

**ATTACHMENT B**  
**VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS**



## VISUAL SITE INSPECTION SUMMARY

Sun Chemical  
3200 Festival Drive  
Kankakee, Illinois  
ILD 075 603 886

Date: May 22, 1992

Primary Facility Representative: Michael Shoven, Plant Engineer  
Representative Telephone No.: (815) 939-0136

Inspection Team: Laura Czajkowski, Resource Applications, Inc. (RAI)  
Tony Dominic, RAI

Photographer: Tony Dominic, RAI

Weather Conditions: 75°F, cloudy, slight breeze.

Summary of Activities: The visual site inspection (VSI) began at 9:30 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at 11:00 a.m. The VSI tour started in the Area of the Oil UST (AOC 2) and the Wastewater Storage Tank (SWMU 4). The tour then proceeded inside the plant to view the Hazardous Waste Satellite Accumulation Area (SWMU 1). The satellite drum was observed to be open. The next unit viewed was the outdoor Former South Hazardous Waste Storage Area (SWMU 6) and the Nonhazardous Waste Storage Area (SWMU 2). The Area of the Diesel Fuel UST (AOC 1) was viewed next. The Former North Hazardous Waste Storage Area (SWMU 5) was viewed, and is currently used for storing raw material. The Hazardous Waste Storage Area (SWMU 3) was then viewed. Three drums of solid waste inks and solvents (D001, D007, F003, F005) were lacking dates on the hazardous waste labels. Light stains were present on the concrete pad. Two cracks were present in the concrete pad on the east edge.

The tour concluded at 11:30 a.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 11:50 a.m.



Photograph No. 1

Location: SWMU 1

Orientation: North

Date: 5/22/92

Description: The drum on the left accumulates solidified resin (F005) and was observed to be open during the VSI. The drum on the right was empty.



Photograph No. 2

Orientation: West

Description: The 20-cubic-yard roll-off box stores nonhazardous spent filter cartridges.

Location: SWMU 2

Date: 5/22/92



Photograph No. 3

Orientation: West

Description: This is a picture of the spent filter cartridges inside the roll-off box.

Location: SWMU 2

Date: 5/22/92



Photograph No. 4

Orientation: West

Description: This is the Hazardous Waste Storage Area. This unit stores liquid and solid waste inks and solvents (D001, D007, F003, F005), waste ink heels (D001, F005), and solidified resin (F005) in 55-gallon steel drums. Seven of the drums contained solid waste inks and solvent (D001, D007, F003, F005) the rest of the drums were empty.

Location: SWMU 3

Date: 5/22/92





Photograph No. 5

Orientation: West

Description: This is a close-up of a drum of solid waste ink and solvent (D001, D007, F003, F005). No date was present on the label. Two other drums of solid waste ink and solvent lacked a date on the drum label.

Location: SWMU 3

Date: 5/22/92



Photograph No. 6

Orientation: West

Description: This is the 5,000-gallon UST that stores the floor washing wastewater.

Location: SWMU 4

Date: 5/22/92





Photograph No. 7

Orientation: North

Location: SWMU 5

Date: 5/22/92

Description: This is where the Former North Hazardous Waste Storage Area was located.  
Currently, product is stored here.



Photograph No. 8

Orientation: West

Location: SWMU 6

Date: 5/22/92

Description: This is the location of the Former South Hazardous Waste Storage Area.



Photograph No. 9

Orientation: West

Description: This is the location of the former 30,000-gallon Diesel Fuel UST.

Location: AOC 1

Date: 5/22/92



Photograph No. 10

Orientation: North

Description: This is the location of the Former 30,000-gallon Oil UST.

Location: AOC 2

Date: 5/22/92

**ATTACHMENT C**  
**VISUAL SITE INSPECTION FIELD NOTES**



(95)

## Sun Chemical

9:30 Am Mike Shoven  
Facility west of IST

North Storage - closed

South Storage - trace elements

have not removed any soil

Still debating if there is

Cyanide contamination

might be false positive

liquid haz. waste

have 1 storage area less than

90 days. 1990.

Solid hazardous

Above ground tanks - 1974 (4)

Steel Varnish resin

(1) 1978

30,000 gallon capacity

(1) 30,000 gallon capacity

1982 - pit KOLP waste

1990 purged & cleaned

analysis done 1992

JK 5/22/92

(96)

## Sun Chemical

No chromium

No source lead -

tested Nonhazardous

Catch tank - hooked up to

French system - wash water

from floor. sent to cool lab

from analysts - Clear Harbors

recycling

Chicago

PCIA - do sampling & transport

1991 - generation rate 30,000 gal

Shelburne

Waste management KID - land fill

Filters -

special waste - month & half changed

drums - steamed - collect solvent

(1) manufacture Zinkite resin

drums 1980's to present

20 yrd roll off

parts washer - naphtha Safety - Clean

eyes, etc

toluene solvent

toluene less conc. solvent → 1981/

stopped

Pigments - cyanide conc. show positive

used to store bags on North

JK 5/22/92

(17)

## Sun Chemical

Storage area -

pigments - now is used, all of it  
no waste -

dust collection systems -

baghouse - reuse back into  
black ink when cleaned out  
recycled.

(2) A. magflask separators - deposit  
metal P200, P203, P205, P207

B. gelonite waste  
solid P205

Cartridge filters - after ink is  
manufactured runs through  
filters -

off spec ink - (D201) - stop 1990  
of generating used to sample  
mix & throw it away now recycled.

to 5/22/92

(98)

## Sun Chemical

NO history of releases -

pigment = yellow black, blue, red  
sucked up into a baghouse  
before it is mixed add  
solvent, varnish, add  
pigment & mixes it.  
shot mills → waste  
separators → waste  
blending tanks (viscosity)  
filtered → waste

Concentrations -

portable tanks  
brought to facility  
and finished

New Jersey Headquarters  
Northlake, IL ~~has~~ headquarters  
Tulsa, OK news print ink

no buried wastes

no wells inside  
city of Kenosha

Sanitary system  
maintenance area  
compressor boiler

both have  
sanitary  
sewers

to 5/22/92

(99)

## Sun Chemical

City of Kankakee get their  
water from the Kankakee  
River:

No PCB waste

No asbestos in building  
built after they stopped using

Building built in 1974  
Agricultural land before  
2 miles nearest residence  
no schools or parks

Kankakee Community College about 2  
miles away south of facility.

Industrial - South  
Farm - North  
Farm - East  
Farm - West

4 to 5 feet top soil  
sand  
bedrock

Security: 8 foot fence - ADT - security  
1 entrance, railroad entrance closed on weekdays

to 5/22/92

(100)

## Sun Chemical

No NPDES permit

Yes water department permit

NO. ~~WSD~~ WDPOLIS

discharge to sanitary sewer  
exp. 4/01/94

Kankakee Metropolitan  
Wastewater Utility

2 months metals  
solids

2 TEMA operating PH  
permits

property - 35 acres

plant - 24,000 sq feet

removed 30,000 gallon

1974 fuel tank - not  
used for 12 yrs  
for boiler

removed 30,000 gallon

1976 diesel fuel tank 1989

a week ago Friday taken out for  
tank soil samples

stop using

5/12/92

to 5/22/92

(101)

## Sun Chemical

Smelled diesel fuel  
filled out incident  
report - waiting  
on analysis.

PCA - handling operation

this year 1992 hope  
to close the North  
& South Storage Areas

10:50 am - intro meeting ended

3 shifts 5 days a week - (d)  
employees

VSI tour started

11:03 am

① 30,000 gal <sup>oil</sup> ~~fuel~~ <sup>fuel</sup> tank

② North

③ UST - pit floor wash

west

④ North  
Satellite Area

to 5/20/92

(102)

## Sun Chemical

QA & Lab

⑤ Baghouse Sack

⑥ South Storage Area  
west

⑦ Filter Cartridges

⑧ UST diesel fuel

temp 75 °F cloudy  
windy

⑨ North Area North  
now stores raw material

⑩ West Outside Horz. West Street  
8-inch thick concrete

7 solids 38 empty

Berm at entrance

some staining  
& cracks on  
east end of pad

to 5/20/92



(103)

Sun Chemical

11:30 am VST - tour ended

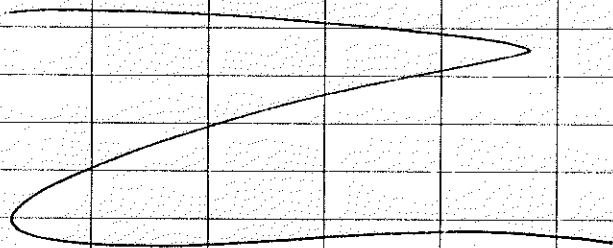
analyze pigment - ~~see the~~ analyze for  
metals - put into black ink  
and reused

trying now to reuse the  
mag flush -  
goal to reuse everything  
except the glycol which  
sets when hits the  
atmosphere

1974 product storage tanks  
installed

11:40 am

left facility at 12:00 —————

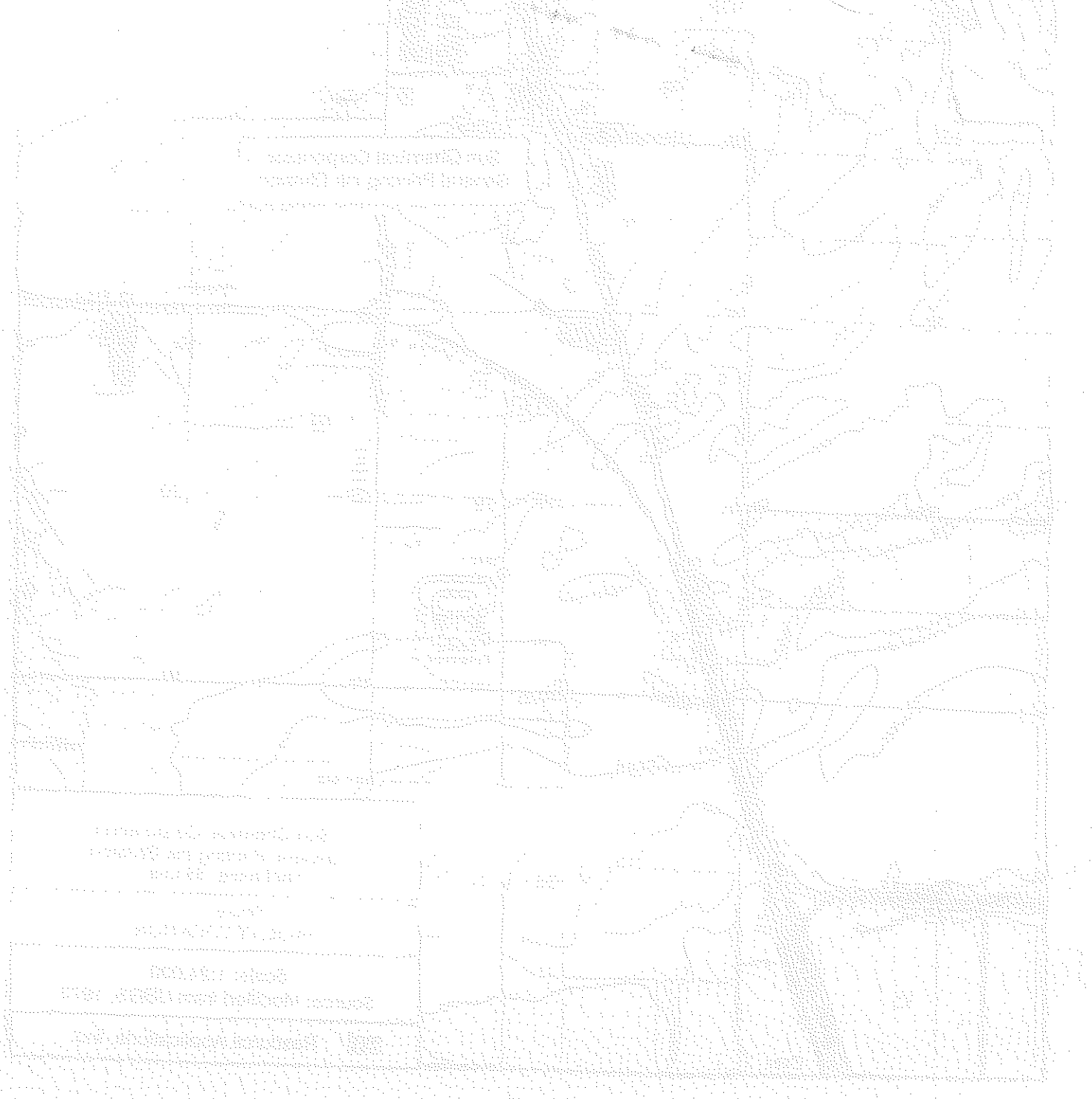


JC 5/2/92



Go +

First Stoplight → Right Over Bridge  
Go to 2nd Stop light 1/2 mile Turn right  
Festival Drive 1st or 2nd Road





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

May 13, 1992

Mr. Mike Shoven  
Sun Chemical Corporation  
3200 Festival Drive  
Kankakee, IL 60901

Re: Visual Site Inspection  
Sun Chemical Corporation  
ILD 075 503 886

Dear Mr. Shoven:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

May 13, 1992

Page 2

The VSI has been scheduled for May 22, at 9:00 a.m. The inspection team will consist of Laura Czajkowski and Tony Dominic of Resource Applications, Inc., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with the present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI. Attachment II is a summary of the information required.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,



Kevin M. Pierard, Chief  
OH/MN Technical Enforcement Section

enclosure

cc: Larry Eastep, Chief, Division of Land Pollution Control, IEPA  
Cliff Gould, Maywood Regional Manager, IEPA  
Mike Cimaglio, Environmental Protection Specialist, IEPA

## ATTACHMENT I

Sun Chemical Corporation  
3200 Festival Drive  
Kankakee, IL 60901

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.



## **ATTACHMENT II**

### **PROBABLE SOLID WASTE MANAGEMENT UNITS (SWMUs)**

1. Little information was available to compile a list of solid waste management units (SWMUs) at your facility. Please list all waste management units at your facility. If possible, please provide as complete information for the waste unit in response to the questions below.

**From the list of probable SWMUs please address the following questions:**

- Do the above SWMUs still exist at the facility and are they in operation?
  - What are the start-up and closure dates of the above SWMUs?
  - What types of wastes are the SWMUs currently/formerly used for?
  - Name any SWMUs at your facility that have not been listed above. These would include hazardous waste storage areas, treatment units, or any other area or system at your facility dealing with hazardous waste including satellite accumulation areas.
  - What are the average volumes and rates of generation of waste streams?
  - Document any releases that have occurred at the facility. This includes spills or leaks of both wastes and raw product. Outline the action taken to clean up the release.
2. Please supply as much information as possible concerning the site history. This would include any information you have regarding operations and any other owner/operators at this location.
  3. Please provide a description of the primary processes taking place at your facility and the waste streams which are generated.
  4. Describe the methods of treatment and disposal of generated waste utilized by your facility.

**If available, the following items are requested:**

- A detailed map of the facility showing the location of the SWMUs and production stations.
- Flow diagrams showing waste streams and waste management practices.
- Copies of any permits currently held by the facility.
- SARA Title III information and a copy of the facility contingency plan.



EW D

REGISTERED - RETURN RECEIPT REQUESTED

Sun Chemical Corporation



General Printing Ink Division

135 West Lake Street  
Northlake,  
Illinois 60164  
(312) 562-0550  
Telex: 72-1542

September 14, 1988

Mr. Lawrence W. Eastep  
P.E., Manager - Permit Section  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Rd.  
Springfield, IL 62706

RE: CLOSURE PLAN REVIEW - SUN CHEMICAL CORP  
3200 Festival Dr.  
Kankakee, IL 60901  
USEPA ID #: 075603886

Dear Mr. Eastep,

As you requested in your letter of August 2, 1988,  
enclosed is a signed certification with the necessary  
information regarding potential releases from Solid  
Waste Management Units for the above mentioned facility.

Please contact my office if you have any questions or  
need additional information.

Sincerely,

Gary M. Andrzejewski  
GPI Division Manager  
Safety, Health & Environmental  
Control

GMA/bm  
Encl.

cc: J. McBurrows  
D. Enright

RECEIVED

SEP 16 1988

IEPA-DLPC

CERTIFICATION REGARDING POTENTIAL RELEASES FROM  
SOLID WASTE MANAGEMENT UNITS  
(CLOSURE PLAN REVIEW)

FACILITY NAME: Sun Chemical Corporation, General Printing Ink Div.  
 EPA I.D. NUMBER: 075603886  
 LOCATION CITY: 3200 Festival Drive, KANKAKEE  
 STATE: IL 60907

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION and in your closure plan.

	YES	NO
• Landfill	_____	<u>X</u>
• Surface Impoundment	_____	<u>X</u>
• Land Farm	_____	<u>X</u>
• Waste Pile	_____	<u>X</u>
• Incinerator	_____	<u>X</u>
• Storage Tank (Above Ground)	_____	<u>X</u>
• Storage Tank (Underground)	_____	<u>X</u>
• Container Storage Area	<u>X</u>	<u>X</u>
• Injection Wells	_____	<u>X</u>
• Wastewater Treatment Units	_____	<u>X</u>
• Transfer Stations	_____	<u>X</u>
• Waste Recycling Operations	_____	<u>X</u>
• Waste Treatment, Detoxification	_____	<u>X</u>
• Other _____	_____	<u>X</u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed on and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

The Kankakee facility stored Hazardous Wastes (i.e) D001, K086. The storage permit was used to allow sufficient time for selection of environmentally sound disposal facilities to handle our waste streams. There has been no disposal or spills at this site to the best of my knowledge.

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application and in your closure plan. please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the part or still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released .
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

There has not been a release, spill, overflow, pipe  
rupture to the best of my knowledge.

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Gary M. Andrzejewski  
GPI Division Manager,  
~~Safety, Health & Environmental Control~~  
Typed Name and Title

X   
Signature

8/30/88

Date



CERTIFICATION REGARDING POTENTIAL RELEASES FROM  
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: SUN CHEMICAL CORPORATION - GPI DIVISION  
EPA I.D. NUMBER: ILD075603886  
LOCATION CITY: KANKAKEE  
STATE: ILLINOIS

RECEIVED

JAN 30 1986

Part A

XS Date 194

SWD - AIS  
U.S. EPA, REGION V

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill	_____	_____X
• Surface Impoundment	_____	_____X
• Land Farm	_____	_____X
• Waste Pile	_____	_____X
• Incinerator	_____	_____X
• Storage Tank (Above Ground)	_____	_____X
• Storage Tank (Underground)	_____	_____X
• Container Storage Area	_____X	_____
• Injection Wells	_____	_____X
• Wastewater Treatment Units	_____	_____X
• Transfer Stations	_____	_____X
• Waste Recycling Operations	_____	_____X
• Waste Treatment, Detoxification	_____	_____X
• Other _____	_____	_____X

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JAN 28 1986

SOLID WASTE DIVISION  
U.S. EPA, REGION V

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

SEE ATTACHMENT

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

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### STATEMENT OF WASTE STREAM MANAGEMENT

We are currently classified as a hazardous waste generator and handle both a solid and liquid waste stream, with toluene solvent being the hazardous constituent in both. The unit capacity of each unit is 120 drums.

Solid waste treatment at this sight consists of packing spent filter cartridges in 55 gallon drums and filling the voids with sand. The drums are stored on an asphalt apron and shipped to a land fill for burial according to existing E.P.A. regulations within the 90 day accumulation period. Solid waste drums disposed of in 1985 amounted to 202, usually in lots of 70 drums each.

Our liquid waste stream is handled in 55 gallon drums which are stored on an asphalt apron. The drums are pumped out into bulk tanker within the 90 day accumulation period in lots of 60 drums or approximately 3000 gallons. The waste is sent for disposal in a secondary fuels program in accordance with current E.P.A. regulations. Total drums disposed of in 1985 amounted to 313.



3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

N/A

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

JOHN MCBURROWS - Plant Manager

Typed Name and Title

*John W. McBurrows*  
Signature

1-24-86

Date



Illinois Environmental Protection Agency

P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 0910550011 -- Kankakee County  
Kankakee/Sun Chemical Corp.  
ILD075603886  
RCRA Permits

October 18, 1988

*George Hager*  
~~Karl E. Bremer~~, Chief  
Technical Program Section  
U.S. Environmental Protection Agency  
Region V  
230 South Dearborn  
Chicago, Illinois 60604

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OCT 24 1988

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Dear Mr. Bremer:

Enclosed you will find the following:

1. The Initial Screening for Environmental Significance form for the above referenced facility.
2. A copy of the Certification Regarding Potential Releases from Solid Waste Management Units for the above referenced facility and/or the reply the Agency received in response to our request for information regarding the above.

The following form(s) were not on file at the IEPA for this facility:

3. Notification of Hazardous Waste Site (EPA Form 8900-1).
4. Preliminary Assessment (EPA Form 2070-12).

Based upon a review of the information available on the above referenced facility, the Agency has determined that this facility is not environmentally significant and that a Facility Management Plan should not be prepared. Please let us know if you do not agree with this determination.

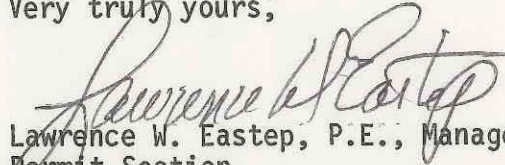




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If you have any questions regarding this initial screening, please contact Eugene W. Dingledine or my staff at 217/782-5504.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:EWD:bls/3265j,1,2

Enclosure

cc: Division File  
USEPA Region V -- Mary Murphy  
FOS Northern Region